



# Los Angeles River Ecosystem Restoration Integrated Feasibility Report

**FINAL Feasibility Report and Environmental Impact Statement/Environmental Impact  
Report**

## **VOLUME 4 : APPENDIX**

L: Public Comments on the Draft Integrated Feasibility Report: (Part 1) Public Comments; (Part 2)  
Responses to Public Comments

**Los Angeles County, California**

**September 2015**



**US Army Corps  
of Engineers®**  
Los Angeles District



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# **Los Angeles River Ecosystem Restoration Feasibility Study**

## **APPENDIX L PUBLIC COMMENTS ON THE DRAFT INTEGRATED FEASIBILITY REPORT**

**April 2015**

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MAX BAUCUS, MONTANA  
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## United States Senate

COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS

WASHINGTON, DC 20510-6175

BETTINA POIRIER, MAJORITY STAFF DIRECTOR  
ZAK BAIG, REPUBLICAN STAFF DIRECTOR

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

RE: Comments on SPL-2013-003-NLH-Draft IFR for LA River Eco. Rest. Study

Dear Ms. Axt:

As the Chairman of the Senate Environment and Public Works Committee, which is responsible for oversight of the U.S. Army Corps of Engineers, and as a Senator from California, I am providing comments on the Corps' Draft Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration Project.

I feel very strongly that the Corps has chosen an alternative that is inconsistent with the Obama Administration's identification of the LA River as a priority in the America's Great Outdoors Initiative and the Urban Waters Federal Partnership, which was launched in 2011 to focus on working with local communities to restore urban watersheds and reconnect urban communities to their rivers. The Assistant Secretary of the Army signed a vision document for the partnership, which says, "We will work from the bottom up rather than taking a top down, one-size-fits-all approach."

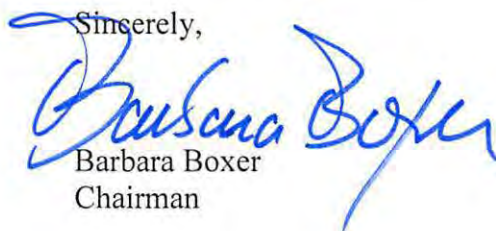
As you know, the Corps District office in Los Angeles, in consultation with the City of Los Angeles, initially recommended Alternative 20, which is the alternative fully supported by local stakeholders. However, Corps headquarters overruled the District and insisted on the selection of Alternative 13. The Corps' approach on the LA River project is exactly the opposite of what the Administration has committed to do in places like Los Angeles!

I have deep concerns about the direction the Corps is heading on this critical study. Alternative 13 would provide much less restoration and leave existing concrete infrastructure in the river, missing an important opportunity to provide a fully restored LA River that will improve the quality-of-life for families that live along its banks. Alternative 20 also promises much greater opportunity for economic development, providing thousands of additional jobs and billions of dollars of increased investment in the local economy.

I call on the Corps to follow the “bottom up” approach and endorse Alternative 20.

I have attached additional detailed comments on the draft feasibility report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barbara Boxer", is written over the printed name and title.

Barbara Boxer  
Chairman

## **ATTACHMENT**

### ***Acceptability and Public Support***

When selecting an alternative, the Corps must determine whether the proposed alternative meets “Acceptability” criteria. According to the Corps’ own planning guidance, “an ecosystem restoration plan should be acceptable to State and Federal resource agencies, and local government. There should be evidence of broad based public consensus and support for the plan.”

Despite known local opposition and no evidence for broad based public consensus, the Corps has identified Alternative 13 as its Tentatively Selected Plan. The draft feasibility study provides no clear rationale for why this alternative meet’s the agency’s criteria for “Acceptability”.

### ***Significance of Ecosystem Outputs***

The Corps’ planning guidance requires “ecosystem restoration alternatives [to be] evaluated on the basis of cost effectiveness and incremental cost analyses of the possible restoration alternatives *and* significance of ecosystem outputs.” (emphasis added) It appears from the conclusions in the draft feasibility report that significance of ecosystem outputs was not given equal weight in selecting Alternative 13. This approach ignores the clear direction in the agency’s own regulations.

The incremental cost calculation used as justification for Alternative 13 does not take into account critical factors such as habitat connectivity. The Corps’ cursory ecosystem significance analysis for each alternative ignores the increased environmental outcomes in Alternatives 16 and 20 and how they will contribute to the overall success of the project.

For example, alternatives 16 and 20 would provide much greater habitat connectivity as compared to Alternative 13 -- an additional 85 percent for Alternative 16 and over 200 percent for Alternative 20. And only Alternative 20 includes the Verdugo Wash Confluence, which links the LA River to the Verdugo Mountains -- a valuable wildlife corridor that has been lost since the river was channelized. It will also provide important habitat for the federally endangered Least Bell's Vireo.

Alternatives 16 and 20 also fully restore the Piggyback yard site, which Alternative 13 fails to do. Instead, Alternative 13 would invest significant funding in creating 113 acres of habitat in this area but would leave it separated from the river by a large concrete wall, relying on existing drainage culverts to provide connectivity. This approach creates habitat that would be inaccessible to mammals, reptiles, and other aquatic life. Alternatives 16 and 20 remove the concrete wall and establish a hydrological connection between the restored habitat at piggyback yard and the river. This is a much wiser approach that will support the long-term success of the restored habitat.

A similar situation exists at the LA State Historic Park. Instead of removing concrete structures and restoring more natural wetlands and river banks at this site, Alternative 13 leaves the

concrete channel in place along much of the river. Because of the hard infrastructure that remains, the restoration in this area will provide reduced habitat and wildlife value.

### ***Environmental Justice***

Alternative 13 does not fully realize the River's potential to bring green space to poor, underserved neighborhoods. Alternatives 16 and 20 provide much greater restoration and additional opportunities for local communities to enjoy a restored river. In addition, Alternative 20 is the only alternative that undertakes restoration at the LA State Historic Park, which provides critical public access for downtown and Chinatown. This area has a poverty rate of 22 percent and a population with limited access to public green space.

In addition to more public access to the restored river, Alternative 16 and 20 will provide much greater opportunity for economic development in the region. According to the Corps' own analysis, full restoration of the river, represented by Alternative 20, will provide 16,833 construction and economic redevelopment jobs versus vs. 4,016 jobs for Alternative 13. Further, Alternative 20 provides nearly \$4.7 billion in labor income versus approximately \$1.2 billion for Alternative 13. Given the high poverty rate in the restoration area, the Corps should consider the impact of the restoration alternatives on the human environment, including the added economic and development benefits that would be provided by Alternative 20.

### ***Cost***

Alternative 13 would require the City to pay approximately 70% of the total project costs because of the significant real estate and environmental remediation elements of the project. To keep the project moving forward and to be a constructive partner, the City has already agreed to pay these additional costs, which greatly exceed the standard non-Federal cost-share for such a project.

Therefore, the Federal investment in this project will be significantly less because of the increased costs borne by the City. Given the substantial contributions of the non-Federal interest, it is troubling that the Corps would place such a great emphasis on the total cost of the project while minimizing other key criteria that it is required to consider and that are important to the local community.



**Congress of the United States**  
**Washington, DC 20515**

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

We are writing to express our strong support for Alternative 20 in the Corps' Los Angeles River Ecosystem Restoration Feasibility Study (Study). As you know, the Corps and the City of Los Angeles (LA) have been working together for the past seven years to complete the Study. At a cost of almost \$10 million, the Study reflects a strong, resilient federal-local partnership that has weathered one of our Nation's most challenging economic downturns.

Through the hard work of the Corps and the City, we are at the threshold of approving a project that will transform the landscape of our Nation's second-largest urban region. Investing in the City's principal flood control infrastructure will finally breathe new life into the river as the great natural and vibrant resource it should be. The revitalized river will create public access that will reconnect communities divided by its channelization, provide green space for our underserved neighborhoods and provide an economic foundation for years to come. This will all, however, only come to fruition if the Corps selects the alternative that is the most complete and effective plan which provides the most benefits for the biological, human, and physical environment-- Alternative 20.

The Obama Administration has endorsed restoration of the LA River through the President's America's Great Outdoors initiative. Led by the Council on Environmental Quality (CEQ) and the Department of the Interior, the effort resulted in EPA's selection of the River as one of 7 first-phase pilots, and Interior's inclusion of a portion of the LA River Trail in the National Recreational Trail System.

The Corps' Study represents a once-in-a-lifetime opportunity for all Angelenos. How we respond will present significant implications for how we value urban ecosystem restoration across the country and ultimately, how we value our responsibilities to our communities. The Study authorization required the Corps to consider the City's LA River Revitalization Master Plan in its alternative selection; yet only one of the alternatives in the final array includes three of the five key opportunities from that Plan while the others include only one. Connecting the LA State Historic Park (former Cornfields site) to the river in downtown would leverage a considerable State investment and restoration of the Verdugo Wash Confluence with its rich connections to the mountains and key habitat for endangered species would also directly benefit the cities of Burbank and Glendale. We strongly believe that the Corps' recommended



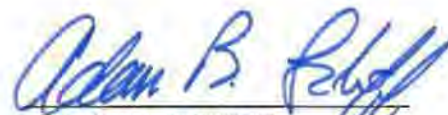
alternative must include the river connection to the LA State Historic Park as this will allow our park-starved, historically-underserved communities access to the river and natural environment that begins to address long-standing environmental justice issues. The Corps' recommended plan must also restore the hydrological connections between the river channel and the Piggyback yard, rather than creating an isolated habitat with minimal connections.

We strongly encourage the Corps to select Alternative 20, which meets the Study objectives and provides the necessary habitat connectivity for sustainable restoration of the river, provides the highest economic development and jobs, and addresses serious environmental justice issues. Fundamentally, the Corps' "acceptability" criterion means that it must be acceptable to the client community. The Mayor, the city councils of Los Angeles and Glendale, and the County Board of Supervisors have formally endorsed Alternative 20 and the community has overwhelmingly supported it. These stakeholders and others understand the urgency of completing this project now.

As you know, meaningfully restoring the Los Angeles River involves connecting as many of the critical pieces of its valuable, but dwindling ecosystem as we can -- now, this unprecedented chance to act exists. We strongly encourage you to consider the comments received from the public, the overwhelming support of the Mayor, local and state officials and stakeholders who, along with federal agencies, are raising critical environmental, economic development, and environmental justice issues -- all in support of Alternative 20 as the Selected Plan. We urge you to embrace the City's vision and select Alternative 20 as the only option that truly meets the long range objectives of the project.

Sincerely,

  
LUCILLE ROYBAL-ALLARD  
Member of Congress

  
ADAM B. SCHIFF  
Member of Congress

  
KAREN BASS  
Member of Congress

  
XAVIER BECERRA  
Member of Congress

Cc: The Honorable Jo-Ellen Darcy, Assistant Secretary of the Army (Civil Works)  
Lieutenant General Thomas Bostick, Commanding General and Chief of Engineers  
The Honorable Eric Garcetti, Mayor, City of Los Angeles



**Congresswoman Lucille Roybal-Allard***Representing California's 40<sup>th</sup> Congressional District*

FOR IMMEDIATE RELEASE: October 17, 2013

CONTACT: [Elizabeth Murphy](#) (202) 225-1766**Statement of Congresswoman Lucille Roybal-Allard in Support of Alternative 20 for the Los Angeles River Ecosystem Restoration Feasibility Study**

Commerce, CA—Today, Congresswoman Roybal-Allard released the following statement:

*Thank you for providing me with the opportunity to comment on the Corps' Draft Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration Study. I appreciate the work done by the Corps' Los Angeles District and the City of Los Angeles to reach this milestone. As you know, in the 1930's the Corps started to pave the LA River and today we are on the verge of reclaiming our river.*

*The Corps has indicated Alternative 13 as the Tentatively Selected Plan in the draft report and by doing so would miss a tremendous opportunity to improve the regional health of Los Angeles. Alternative 13 is inadequate as it does not meet the range of objectives outlined in the Corps' own Study. Based on the key technical, environmental, and economic development reasons I have heard from constituents, and I am confident the Corps will hear during this public comment period, it is clear that Alternative 13 is inadequate, as it includes limited ecosystem restoration, and the Corps should reject this limited alternative as not meeting the range of Corps' objectives.*

*Fortunately, within the Corps' draft Report, Alternative 20 does meet the range of objectives and includes key ecosystem restoration features, such as connecting the LA State Historic Park to the river in downtown, as well as restoring the Verdugo Wash Confluence, Taylor Yard/Bowtie, Taylor Yard/G-2, the Arroyo Seco Confluence, and the Piggyback Yard. These features will restore critical hydrological connectivity in the river and provide much needed riparian habitat, as well as reverse the trend of rapid biodiversity loss and restore the health and resilience to the natural and human environments. This is the alternative that the Corps should select moving forward.*

*Not only does Alternative 20 include critical ecosystem restoration features, but it is also broadly supported by the community. Alternative 20 will also provide an economic boost to the area, increasing property values in the vicinity of the Study area and improving the quality of life for residents of Los Angeles. According to the Corp's own analysis, full restoration of the river, represented by Alternative 20, will provide 425% more economic redevelopment employment and 400% more economic redevelopment income than Alternative 13. I understand that the business community has indicated their support of full restoration of the river.*

*As you know, this Administration selected the Los Angeles River as one of seven areas chosen in the first-phase of the Urban Waters Federal Partnership, which seeks to implement the Americas Great Outdoors (AGO) Initiative. Alternative 20 is the only option for fully meeting the goals of the AGO to stimulate*

*regional and local economies, create local jobs, improve the quality of life, and protect Americans' health by revitalizing urban waterways in under-served communities.*

*I am also worried about our children. They don't all share in the same opportunities for clean water, clean air, and a healthy lifestyle. This plan will help connect our children to the wider range of environmental opportunities. With alternative 20, the Corps strikes a fair balance between restoring the environmental habitat and ensuring a robust base for economic development.*

*Thank you, again, for allowing me this opportunity to share my comments on the Draft Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration Study. I strongly urge you to select Alternative 20 as the Plan moving forward so that we can begin the process of restoring and reclaiming our river for our community.*

###



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## **Congressman Adam Schiff Statement in Support of Alternative 20**

Los Angeles Army Corps of Engineers -

Los Angeles River Study Public Hearing

October 17, 2013

Several years ago, I was proud to join with Congresswoman Lucille Roybal-Allard in efforts to designate the L.A. River as part of the Department of the Interior's 'America's Great Outdoors' program. Since then, the Army Corps of Engineers has been conducting the Los Angeles River Restoration Feasibility Study in partnership with the City of Los Angeles, to investigate opportunities to restore the natural and cultural heritage of the L.A. River.

On September 24, I met with the Colonel Kim Colloton, Commander of the Los Angeles District, U.S. Army Corps of Engineers and her staff in my district office to discuss the Integrated Feasibility Report. She discussed the Corps reasoning and methodology in deciding on Alternative 13 as the Tentatively Selected Plan. While I appreciate the Corp's concern with the most cost-effective option, I join fellow nature lovers and river advocates in voicing my support for Alternative 20 – and a comprehensive restoration of the LA River.

The Army Corps' report showcased several different alternatives for restoration of the L.A. River, and it's now up to river advocates to push for an expansive plan that will make the river contiguous and includes significant ecological restoration – and the best choice is 'Alternative 20.' This option – called RIVER, for Riparian Integration via Varied Ecological Reintroduction – is the most aggressive restoration plan as it includes all of the elements of Alternatives 10, 13, and 16, and also includes naturalization and ecological restoration in all reaches of the river and inclusion of two major confluences. Specifically, Alternative 20 includes the restoration and beautification of the Verdugo Wash bordering the City of Glendale and the connection of the LA River to the Los Angeles State Historic Park (Cornfields). The residents of my congressional district, which includes the cities of Burbank, Glendale, and many Los Angeles City neighborhoods adjacent to the river, will have greater access to the river for recreation and an improved quality of life.

I recently had the pleasure of taking my son on a kayaking adventure down the Los Angeles River – and witnessed a true revival of this wonderful habitat. We saw abundant plant life, navigated rapids – almost fell over several times – watched a blue heron dry its wings, and marveled at the resiliency of the nature around us. I've gone running and biking along the river, attended community events and cleanups along its banks, and seen firsthand how a river that once divided communities is now bringing them back together. It's my hope that the Army Corps of Engineers will continue to work with the City and nature lovers to embrace a public-private partnership and complete restoration of the L.A. River so that the ecosystem remains strong for future generations.



# United States Department of the Interior

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IN REPLY REFER:  
(ER 13/0667)

*Filed Electronically*

22 November 2013

Ms. Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Subject: Review of the Draft Environmental Impact Statement (DEIS) for the Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Los Angeles County, California.

Dear Dr. Axt:

Thank you for the opportunity to comment on the Review of the Draft Environmental Impact Statement for the Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Los Angeles County, CA. The Department of Interior (Department) has the following comments to offer:

The report evaluates options for restoration of 11 miles of the Los Angeles River between Griffith Park and downtown Los Angeles, while maintaining existing levels of flood risk management. The Draft EIS/EIR evaluates the baseline No-Action Alternative and four action alternatives: Alternative 10, 16, 20, and the agency-preferred Alternative 13.

Restoration measures considered include creation and reestablishment of historic riparian strand and freshwater marsh habitat to support increased populations of wildlife and enhance habitat connectivity within the study area, as well as to provide opportunities for connectivity to ecological zones, such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains. Restoration includes the reintroduction of ecological and physical processes, such as a more natural hydrologic and hydraulic regime that reconnects the river to historic floodplains and tributaries, reduced flow velocities, increased infiltration, improved natural sediment processes, and improved water quality. The study also evaluates opportunities for passive recreation that is compatible with the restored environment.

The Department appreciates the opportunity to comment on the Study EIS/EIR. The proposed restoration of the Los Angeles River is important to the Department from four important considerations: (1) the Los Angeles River is adjacent to the Santa Monica Mountains National Recreation Area (SMMNRA); (2) the Rivers, Trails, and Conservation Assistance (RTCA)

Program's current and past projects along the Los Angeles River; (3) the proposed project's location within the planning corridor for the Juan Bautista de Anza National Historic Trail through the Los Angeles region; and (4) the Los Angeles River is situated in the study area for the Rim of the Valley Special Resource Study. Restoration of the river would promote the National Park Service (NPS) mission to protect the nation's natural and cultural resources while providing for the recreational enjoyment of those resources.

#### Santa Monica Mountains National Recreation Area

We find that Alternative 20 would be most compatible with NPS goals and objectives for habitat restoration, habitat connectivity, and contributing to a quality outdoor recreation experience.

The Los Angeles area generally, and the San Fernando Valley in particular, are extremely challenging for wildlife and wildlife movement. Riparian areas along streams and rivers are valuable as wildlife movement corridors, and NPS has seen this in studies of carnivores, including bobcats, coyotes, and mountain lions, throughout the Santa Monica Mountains, Simi Hills, and surrounding regions. In the areas around the Los Angeles River, though, the amount of natural wildlife habitat and the opportunities for wildlife movement are severely limited. Restoration of the river, in particular making it natural and not an intensely fenced and regulated deep concrete channel, would provide both habitat and connectivity for wildlife in this highly urbanized area. SMMNRA tracked a female coyote (C028) in the San Fernando Valley during our nine-year coyote study. C028 had been captured in SMMNRA federal parkland in the Simi Hills, but then dispersed out into the San Fernando Valley - every time C028 was relocated, this animal was either at Pierce College, or at Sepulveda Basin, two of the last relatively vegetated areas in the Valley. The Los Angeles River connects these two areas. SMMNRA determined that C028 occasionally followed the river to travel between habitat areas, even in the river's highly altered and channelized state. Restoration of the river along as many stretches as possible would greatly increase its value as a movement corridor.

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In the Griffith Park area, NPS wildlife biologists have been following a mountain lion (P22) that has resided in Griffith Park at least since February of 2012. Based on genetic testing, it appears that P22 was born in the Santa Monica Mountains, which would mean that P22 crossed over both the 405 and the Hollywood (101) freeways to get into Griffith Park. One of the likely ways that P22 might have done this would have been along the Los Angeles River, although the highly restricted and channelized nature of the river near the park makes it extremely challenging for wildlife to get in or out of it. It is possible that P22 will attempt to leave Griffith Park at some point to locate female mountain lions with which to mate. If P22 were to attempt to go west, a restored river would greatly facilitate safe movement. However, the closest large natural area to Griffith Park, in terms of straight distance, is the Verdugo Hills to the northeast. Unfortunately, the opportunities to cross the intensely urbanized areas of Burbank and Glendale are even fewer than those to the west. If the Verdugo Wash were restored, this could be extremely beneficial in terms of increasing connectivity between Griffith Park, at the east end of the Santa Monica Mountains, and the Verdugo Hills, which then connect to the San Gabriel Mountains to the north.

Finally, restoring the Los Angeles River would be extremely valuable as wildlife habitat for other species, particularly birds. The Sepulveda Basin is already a very important habitat area for birds, both residents and especially migrants. Again, the amount of natural area, or something that is at least vegetated and natural appearing, is negligible in the valley and in areas around and along the River. Restoration would greatly increase the amount of available habitat

for all kinds of bird species in this highly urbanized landscape. This would be valuable for the birds, of course, but also for the residents of the city and the valley that greatly enjoy birdwatching as a recreational activity, and as a resource for education in the city about the value and wonder of wildlife.

Our understanding is that the Santa Monica Mountains Conservancy (Conservancy), a California state agency tasked with land acquisition to protect and restore park resources and provide recreational opportunities, has submitted a detailed comment letter regarding the subject Draft EIS/EIR. The Conservancy's comments elaborate on the importance of maximizing restoration efforts that would result in long-term improvements to native habitat quality and enhance habitat connectivity. The Conservancy recommended Alternative 20 would be the best way to achieve restoration of these natural resource values. The Superintendent at SMMNRA is a member of the Conservancy Board of Directors, and therefore concurs with the Conservancy's comments and the Department incorporates this information by reference.

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The Conservancy also notes the importance of providing passive recreation opportunities. The Los Angeles River is one of seven initial pilot locations selected in 2011 for the nation's Urban Waters Federal Partnership, in which NPS is participating to help reconnect urban communities with their waterways by improving coordination among federal agencies and collaborating with community-led revitalization efforts for economic, environmental and social benefits. As part of President Obama's America's Great Outdoors Initiative, the Los Angeles River Trail was selected in 2011 as one of two priority projects in California, with NPS being the federal lead in identifying opportunities for federal agencies to support City of Los Angeles's efforts to implement the Los Angeles River Revitalization Master Plan along the 11-mile reach of the river being studied by the USACE.

#### Juan Bautista de Anza National Historic Trail

The 11 miles of the Los Angeles River evaluated in the subject Draft EIS/EIR fall entirely within the identified recreation corridor of the Juan Bautista de Anza National Historic Trail (NHT), which was established to commemorate the 1775-76 Spanish expedition of the more than 240 men, women, and children who journeyed across the frontier of New Spain to settle Alta California.

In highly urbanized segments of the historic trail corridor, such as that found throughout the greater Los Angeles area, the ability to connect the compelling, multi-ethnic Anza story to the community and raise awareness of its place in shaping local history is greatly dependent upon environmental conditions which provide a vicarious experience of the setting and surroundings representative of what the expedition would have encountered along its historic journey.

The Army Corps' consideration of various environmental restoration measures to provide opportunities for the creation and reestablishment of historic riparian and freshwater marsh habitat, supporting wildlife and natural ecological processes, has direct and positive implications to NPS efforts towards sharing Anza's story and revealing the nature of the expedition's journey in this area centuries ago.

Every effort made to improve habitat quality in this area not only facilitates the community's connection to its natural environment but to its cultural heritage as well. Therefore, the Department endorses the efforts to restore natural habitat and ecological processes along the Los



Angeles River, and urges that the Army Corps capitalize on this opportunity by selecting an alternative which maximizes restoration efforts as extensively as possible.

#### Rivers, Trails & Conservation Assistance Program

The NPS Rivers, Trails and Conservation Assistance Program (RTCA) has provided support for many years to many locally-led resource conservation and outdoor recreation efforts along this 11-mile reach of the Los Angeles River. RTCA works in partnership with local government and non-profit organizations to help achieve their objectives consistent with the Outdoor Recreation Act (1963), the National Trails System Act (1968) and the Wild and Scenic Rivers Act of (1968).

RTCA has provided technical assistance to a range of local partners that collectively are working in the Los Angeles River area to build upon the local network of parks, places, and open spaces that enhance the protection and understanding of America's heritage and resources, and provide close-to-home recreational opportunities for communities. An overview of RTCA-supported projects that interface with the "Area with Restoration Benefits and Opportunities for Revitalization" (ARBOR) area is attached. Each of these projects received RTCA assistance through a competitive application process.

RTCA has also been engaged in the ARBOR reach of the Los Angeles River through two federal, interagency efforts. In 2010, President Obama launched the federal America's Great Outdoors (AGO) Initiative to develop a 21st Century conservation and recreation agenda. As part of AGO, the Los Angeles River Trail was selected in 2011 as one of two priority projects in California, with NPS being the federal lead in identifying opportunities for federal agencies to support City of Los Angeles' efforts to implement the Los Angeles River Revitalization Master Plan along the ARBOR reach. Additionally, the Los Angeles River Watershed is one of the initial seven pilot locations selected in 2011 for the nation's Urban Waters Federal Partnership, in which NPS is participating. NPS is supporting these initiatives in part through the RTCA projects identified above.

The action alternatives presented in the Study EIS/EIR support achieving the community-defined goals of the Los Angeles River projects identified above. As described in *Section 5: Evaluation of Alternative Plans and Environmental Consequences* of the Study EIS/EIR, the greatest benefits to biological resources, recreation and aesthetics would occur as the result of implementing Alternative 20. This alternative best meets the goals and objectives of the locally-led projects that RTCA has supported.

#### National Recreation Trails Program

In May 2012, Secretary of the Interior Ken Salazar announced the designation of the Los Angeles River Trail (Greenway/Bike Path) as a national recreation trail, making the trail part of the national trails system. The designated reach is approximately seven miles from the north side of Griffith Park at Riverside Drive (at Zoo Drive) along the Los Angeles River to Barclay Street in Elysian Valley, north of downtown Los Angeles. The National Trail System Act of 1968 (Public Law 90-543) authorized creation of a national trail system comprised of National Recreation Trails, National Scenic Trails and National Historic Trails. While National Scenic Trails and National Historic Trails may only be designated by an act of Congress, National Recreation Trails may be designated by the Secretary of Interior or the Secretary of Agriculture to recognize exemplary trails of local and regional significance in response to an application from the trail's managing agency or organization. Through designation, these trails are

recognized as part of America's national system of trails. The national recreation trail program is jointly administered by the NPS and the USDA Forest Service in conjunction with a number of other federal and nonprofit partners.

The action alternatives presented in the Study EIS/EIR would enhance the reach of the Los Angeles River Trail that is designated a national recreation trail. As described in *Section 5: Evaluation of Alternative Plans and Environmental Consequences* of the subject Draft EIS/EIR, RTCA concludes that the greatest benefits to biological resources, recreation and aesthetics would occur as the result of implementing Alternative 20, and that these benefits would best enhance the Los Angeles River NRT.

#### Rim of the Valley Corridor Special Resource Study

The Consolidated Natural Resources Act of 2008 (P.L. 110-229 – May 2008) directed the NPS to conduct a special resource study of the area known as the Rim of the Valley Corridor, generally including the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi, and Conejo Valleys in California. The 11-mile stretch of the Los Angeles River under consideration for restoration by the U.S. Army Corps of Engineers feasibility study is included within the NPS special resource study area. The study legislation directs the NPS to determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park unit (Santa Monica Mountains National Recreation Area); and to explore other ways that private and governmental entities can protect resources and provide more outdoor recreation opportunities.

The NPS conducted public scoping for the special resources study in 2010 and released preliminary findings and alternative concepts for public review in 2012 in Newsletter #3. Habitat connectivity is a key issue being considered in exploring alternatives for protecting and interpreting nationally significant resources within the study area. This 11-mile stretch of the Los Angeles River was included in a potential expansion of the Santa Monica Mountains National Recreation Area (preliminary alternative concept C) in the draft study report and environmental assessment currently being prepared by the study team. The draft study report will be presented to the public for comment in summer 2014. A final study report is scheduled for submission to Congress in early 2015. For additional information on the Rim of the Valley Special Resource Study (RIVA) and a study area map, please refer to the project website at: [www.nps.gov/pwro/rimofthevalley](http://www.nps.gov/pwro/rimofthevalley).

For clarification regarding our comments, or for further assistance in addressing these concerns and recommendations, please contact the following persons directly as needed:

David Szymanski, Superintendent, Santa Monica Mountains National Recreation Area, 401 W. Hillcrest Dr., Thousand Oaks CA 91360 (805) 370-2344.

Naomi Torres, Superintendent, Juan Bautista de Anza National Historic Trail, 333 Bush St., Ste.500, San Francisco CA 94104 (415) 623-2315

Anne Dove, RTCA Outdoor Recreation Planner, National Park Service, 570 W. Avenue 26, #175, Los Angeles CA 90065 (323) 441-9307

Barbara Butler, Rim of the Valley Study, National Park Service, 333 Bush St., Ste.500, San Francisco, CA 94104 (415) 623-2311

The Department of the Interior very much appreciates the opportunity to review the Draft EIS/EIR document and provide information and recommendations needed in order to prepare the subsequent Los Angeles River Ecosystem Restoration Integrated Feasibility Report.

Sincerely,

A handwritten signature in black ink, reading "Patricia Sanderson Port". The signature is fluid and cursive, with the first name "Patricia" being the most prominent.

Patricia Sanderson Port  
Regional Environmental Officer

Enclosure: Summary of NPS RTCA projects in the Los Angeles River watershed

cc:

Director, OEPC

OEPC Natural Resource Management Team Leader, Dave Sire

OEPC Staff Contact, Loretta B. Sutton

Alan Schmierer, NPS

## Attachment 1

Summary of NPS RTCA projects in the Los Angeles River watershed

Project/Date: Los Angeles River Master Plan (FY92-FY96)

Partner: Los Angeles County Department of Public Works

Location: 51-mile Los Angeles River Corridor and 9-mile Tujunga Wash from the San Fernando Valley to Long Beach

Description: The project objectives are to improve the appearance of the river; promote the river as an economic asset to the surrounding communities; preserve, enhance and restore environmental resources in and along the river; ensure that flood control and public safety needs are met considering storm water management alternatives; and provide a safe environment and a variety of recreational opportunities along the river--ensure safe access to and compatibility between the river and other activity centers.

Project/Date: Arroyo Seco Watershed Restoration Feasibility Study (FY01-03)

Partners: North East Trees & Arroyo Seco Foundation

Location: Arroyo Seco Watershed including portions of the Angeles National Forest; unincorporated community of Altadena; and the Cities of La Canada Flintridge, Pasadena, South Pasadena, and Los Angeles

Description: The project objectives are to improve and connect 22 miles of trails along the Arroyo Seco, and to the extent feasible, restore the hydrologic and ecological functioning of this watershed as an integrated system.

Project/Date: Cornfield Arroyo Specific Plan (FY12-13)

Partner: Los Angeles Department of City Planning:

Location: City of Los Angeles' Cornfield Arroyo Specific Plan (CASP) area around the Los Angeles River and Arroyo Seco confluence including portions of the communities of Lincoln Heights, Cypress Park, and Chinatown.

Description: The project objective is to create a 7.2-mile neighborhood trail network that will connect the community to the Los Angeles River, Arroyo Seco and Los Angeles State Historic Park; and engage high school students in assessment, and planning and design recommendations.

Project/Date: Griffith Park Anza Trail (FY13-14)

Partner: Friends of Griffith Park

Location: Griffith Park, City of Los Angeles

Description: This project will result in enhancements to 4 miles of existing certified Juan Bautista de Anza National Historic Trail within Griffith Park which will improve community access to the trail, increase awareness of its historic significance, and support long-term conservation of the resource.

Project/Date: Safe Routes to the River (FY 13-14)

Partner: Mountains Recreation and Conservation Authority

Location: Three communities along the Los Angeles River from its headwaters in Canoga Park to the confluence with the Arroyo Seco, including the Glendale Narrows section of the river.

Description: The project will result in 2-3 miles of safe urban routes between the Los Angeles River and 3-4 targeted schools and adjacent neighborhoods, and engagement of high school students in assessment, and planning and design recommendations.

Project/Date: Northeast Los Angeles Riverfront Recreation and Open Space (FY13-14)

Partner: City of Los Angeles, Community Development Department

Location: Glendale Narrows reach of the Los Angeles River and surrounding communities of Cypress Park, Elysian Valley, Glassell Park, and Atwater Village.

Description: The project objectives are to implement approximately 9 miles of the recreational route of the Juan Bautista de Anza National Historic Trail; enhanced access to the Los Angeles River; and facilitate water-based recreation including kayaking, canoeing and fishing along this river reach in part through the “Los Angeles River Recreation Zone Pilot Program”.



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-LA-14B0040-14CPA0006

NOV 25 2013

Colonel Kimberly M. Colloton, PMP  
District Engineer  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, California 90053-2325

Attention: Josephine Axt, PhD

Subject: Los Angeles River Ecosystem Restoration Feasibility Study

Dear Colonel Colloton:

On behalf of the U.S. Fish and Wildlife Service (Service), thank you for the opportunity to provide comments on the U.S. Army Corps of Engineers (Corps) Los Angeles River Ecosystem Restoration Feasibility Study (Study). Of the four primary Alternatives presented in the Study's Final Array, we endorse Alternative 20 because it is closely aligned with the mission of the Service based on three factors: Connecting People with Nature; outreach to underserved communities; and enhancing biodiversity.

The Service's Connecting People with Nature Initiative recognizes the natural world is part of our heritage and it is our responsibility to make opportunities for youth to experience the natural world and for children to grow up with the chance to develop a relationship with the land where they live. The City of Los Angeles has one of the lowest ratios of open space per capita for its residents of any city in the nation. Alternative 20 provides a significant increase in the amount of restored open space created for Los Angelinos to interact with the natural world and maximizes the opportunity to connect with nature on land relevant to their neighborhoods.

This past fall, the Service launched a multi-faceted Urban Wildlife Refuge Initiative to make its programs reflect the diverse perspectives, values, and cultures of America. This initiative strives to make programs far more relevant to millions of Americans living in urban settings by giving them myriad ways to participate in wildlife conservation and recreation. Such opportunities to participate in outdoor related activities will provide economic benefits to local communities as new generations of city dwellers learn about wildlife-dependent recreation. Many Los Angelinos have grown up without any real connection to wildlife or nature. For this reason, one of the eight pilot projects selected as part of the Refuge Initiative is the Los Angeles River Urban Wildlife Refuge Partnership. It is our intent to work with our Federal partners along the Los Angeles

Colonel Colloton (FWS-LA-14B0040-14CPA0006)

2

River to bring "the people to the river and the river to the people." Alternative 20 increases the chance to bring nature into people's lives in one of the most urbanized areas of the country.

The Corps recognizes that the primary purpose of the proposed alternatives is to restore natural hydrological functions providing riparian and aquatic habitats supporting a variety of sensitive wildlife and enhance key linkages that potentially provide for wildlife to move across the landscape now fractured by development. Alternative 20 will accomplish more habitat restoration thus creating habitats and open space, while forming wildlife corridors to areas adjacent to the river floodplain.

Southern California geographically sits in a world-renowned biodiversity hotspot, the California Floristic Province. Unfortunately, this region has been severely impacted by development. None of the proposed alternatives in the Feasibility Study will reverse impacts of previous land use practices; however, Alternative 20 has the greatest potential to improve biodiversity historically associated with the floodplain. One of the management issues associated with this region is climate change. Alternative 20 addresses some of the potential impacts of climate change by mitigating the increase in urban temperatures, improving water quality, increasing shade factors, and lowering evaporation rates.

Alternative 20 maximizes the collective effort of the Federal government to most efficiently join the similar goals various agencies have to increase people's exposure to the natural world and enhance the living environment of a diverse group of people. In particular, Alternative 20 provides an ideal opportunity to effectively reach out to underserved communities. We support Alternative 20 because it provides habitat restoration and opportunities for outdoor recreation. We believe the unique urban partnerships created by Alternative 20 can inspire the imagination of citizens and help create a connected conservation constituency of people who are aware of, understand, and support fish and wildlife conservation.

Thank you again for the opportunity to provide comments on Corps' Study. If you have any questions regarding this letter, please contact Clark Winchell, Division Chief, Conservation Partnerships Program, of this office at 760-431-9440, extension 275.

Sincerely,



Jim A. Bartel  
Field Supervisor





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

US EPA

OFFICE OF THE  
REGIONAL ADMINISTRATOR

NOV 25 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, California 90053-2325

Subject: Los Angeles River Ecosystem Restoration Feasibility Study Draft Integrated Feasibility Report (Feasibility Study/Environmental Impact Statement/Environmental Impact Report), Los Angeles County, California (CEQ#20130289)

Dear Dr. Axt:

The Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the above project. Our review and comments are pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Feasibility Report and Draft EIS clearly demonstrates the need to restore the stretch of the Los Angeles River from Griffith Park to Downtown Los Angeles through the reestablishment of habitat communities; reconnection to tributaries, its historic floodplain, and the habitat zones of local mountain ranges; and maintenance of the existing levels of flood risk management. The action alternatives provide various degrees of restoration that would increase habitat acreage and connectivity. They would also result in more natural hydrologic regimes that would reconnect the river to historic floodplains, reduce flow velocity, increase infiltration, improve water quality, and help prepare for the effects of climate change.

EPA strongly supports restoration of the LA River and the use of green infrastructure (<http://water.epa.gov/infrastructure/greeninfrastructure/index.cfm>) to improve the management of local water resources. As lead federal agency for the Urban Waters Federal Partnership's Los Angeles River Watershed pilot project, EPA has worked closely with over 40 organizations involved in LA River issues, including the US Army Corps of Engineers. Guiding the work of the LA River pilot are the mission, vision and principles of the national Urban Waters Federal Partnership, which were agreed upon by federal agencies participating in this national partnership on June 24, 2011:

- Promote clean urban waters;
- Reconnect people to their waterways;
- Water conservation;



- Use urban water systems as a way to promote economic revitalization and prosperity;
- Encourage community involvement through active partnerships;
- Be open and honest, listening to communities;
- Focus on measuring results and evaluation to fuel future success.

In addition to the Federal Partnership principles, the local LA River Watershed pilot project has identified the following goals specific to the LA River Watershed:

- Restore ecosystem functions;
- Balance revitalization with flood avoidance to ensure public safety;
- Reduce reliance on imported water supply;
- Foster sustainable stewardship.

While all of the Action Alternatives in the Draft EIS would provide restoration benefits consistent with the Corps' restoration mission and the purpose and need for the project, the expanded restoration work provided by Alternative 20 would best achieve the national and local Urban Waters Partnership goals. Alternative 20 would provide the most benefits for water quality via improved stormwater management; provide the most benefits for water conservation and local water independence due to greater replenishment of local groundwater supplies; achieve the most for ecosystem restoration, especially in terms of ecosystem connectivity and quality of habitat; and provide opportunities for increased economic value in terms of temporary and permanent job creation.

As discussed in the enclosed Detailed Comments, the benefits associated with greater degrees of restoration do not appear to have been fully considered in the Corps' incremental cost determination. We recommend that the Final EIS more thoroughly quantify the benefits of the Action Alternatives. Such an accounting may reflect more favorably on the increasingly restorative alternatives than the Draft EIS indicates.

Although Alternative 13 has been identified as the "Tentatively Selected Plan", the Draft EIS does not identify a NEPA preferred alternative. Based on our review of the Draft EIS, we have rated all of the action alternatives as *Lack of Objections* (LO) (see enclosed "Summary of EPA Rating Definitions"). In light of the considerations discussed above and in the enclosed Detailed Comments, we encourage the Corps to select Alternative 20, which would maximize the ecosystem benefits of the Corps' action.

We appreciate the opportunity to review this Draft EIS. Should you have any questions regarding our comments, please contact Kathy Goforth at (415) 972-3521, or contact Jean Prijatel, the lead reviewer for the project. Jean can be reached at (415) 947-4167 or [prijatel.jean@epa.gov](mailto:prijatel.jean@epa.gov).

Sincerely,



Jared Blumenfeld

Enclosures:                      Summary of EPA Rating Definitions  
    EPA Detailed Comments

cc: **Jon Avery, U.S. Fish and Wildlife Service**  
**Scott Harris, California Department of Fish and Wildlife**  
**Shirley Birosik, Regional Water Quality Control Board – Los Angeles**

## SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### ENVIRONMENTAL IMPACT OF THE ACTION

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### ADEQUACY OF THE IMPACT STATEMENT

#### ***"Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS; which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.



**U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR LOS ANGELES RIVER ECOSYSTEM RESTORATION, LOS ANGELES, CA, NOVEMBER 2013**

**Water Quality**

The Draft EIS does not clearly state the increasing environmental benefits that would result from the more restorative action alternatives as more impervious surfaces are removed and larger areas of wetlands and green space are restored. This provides more opportunities for the use of green infrastructure tools. The benefits of green infrastructure include improved water quality as urban runoff – the greatest source of the River’s water quality impairments (page 3-25) – is infiltrated into the subsurface, thus reducing pollutant loads to the River.

The Draft EIS does discuss the need for a Clean Water Act Section 401 water quality certification for construction impacts from the Los Angeles Regional Water Quality Control Board. EPA Region 9 would like to be consulted during the application for certification.

***Recommendation:***

We recommend that the Final EIS consider environmental benefits to water quality from increased infiltration and reduced urban runoff in the alternative selection analysis.

We request that the Corps consult with EPA Region 9’s Water Division in its application for Section 401 certification.

**Groundwater Replenishment**

The increased use of green infrastructure tools, including stormwater infiltration, would also result in replenishment of groundwater supplies, thus meeting local objectives of better use of local water resources and reduced reliance on imported water. Local planning efforts with a high priority on improved management of local water resources by increasing stormwater infiltration to replenish groundwater supplies include plans listed in Section 15.14.1: Los Angeles Urban Water Management Plan and the Integrated Regional Water Management Plan. EPA considers enhancement of southern California groundwater supplies to be a very desirable factor in reducing stress on the sources of southern California’s imported water, including the San Francisco Bay Delta.

***Recommendation:***

We recommend that the Final EIS consider the benefits from increased groundwater replenishment in the alternative selection analysis.

**Habitat Connectivity**

Increasing habitat connectivity is one of two primary Specific Planning Objectives for the LA River study area; however, the Combined Habitat Assessment Protocol used to calculate habitat units does not capture benefits of habitat connectivity. The habitat units generated by CHAP were used to calculate the incremental costs per unit to be used in the selection of an alternative. Therefore, increases in habitat connectivity, and resulting increases in habitat quality, may not be adequately considered in the incremental cost analysis, potentially leading to an undervaluation of more restorative alternatives. We note that the Draft EIS states that factors other than habitat units were considered in the evaluation of alternatives, but remain concerned that they are not valued in the incremental cost analysis that prioritized Alternative 13 as the Tentatively Selected Plan.

As stated in Appendix G of the document, connections between habitat areas are critical to the resiliency and sustainability of ecosystem restoration. Alternative 20 provides significantly more habitat

connectivity to the Verdugo Mountains and Elysian Hills, in addition to increased hydrologic connection to the floodplain in the Piggyback Yard area (also seen in Alternative 16). It is unclear how the significantly greater connectivity in Alternative 20 was considered in the selection of the Tentatively Selected Plan. The preference for Alternative 13 refers to an increase of nodal and regional connectivity of 309%. This calculation is derived from a comparison to the connectivity achieved by Alternative 10. If Alternative 10 is the baseline, it appears that Alternative 20 achieves an increase in connectivity of approximately 1200%.

***Recommendation:***

We recommend that the Final EIS include further discussion of how habitat and hydrologic connectivity are calculated and considered in the selection of a final alternative.

**Climate Change**

In the No Action Alternative analysis, the Draft EIS mentions that climate change will likely increase the frequency of extreme weather conditions in the future, possibly compounding and increasing watershed peak flows. The document does not explicitly evaluate the potential benefits of restoration for the River's capacity to accommodate potential climate change-induced increases in watershed flows, except to say generally that the project would "enhance stormwater management by creating more pervious surfaces in multiple Reaches, which would increase potential for stormwater to infiltrate into the ground."

In light of the President's November 1, 2013 Executive Order "Preparing the United States for the Impacts of Climate Change," there is a great opportunity with the LA River ecosystem restoration to maximize the climate-resilient elements of restoration and encourage investment in these elements.

***Recommendation:***

We recommend that the Final EIS include a discussion about the benefits to climate change resiliency of each of the alternatives and how such benefits are integrated into the selection of a final alternative. We further recommend that the Corps coordinate findings with the Bureau of Reclamation and its Los Angeles Basin Stormwater Conservation Study, which is also evaluating climate change models in the watershed.

**Environmental Justice**

The Draft EIS discusses the temporary construction impacts – noise and reduced air quality – to environmental justice communities, and the proposed mitigation measures for those impacts. It also briefly discusses the health benefits of increased open space and access to recreation areas, but does not clearly disclose that there would be increasing degrees of public health benefits to local residents for each alternative as the recreational and open space increases.

The Draft EIS suggests that there may be a reduction in jobs for the local environmental justice community at the Piggyback Yard or other industrial sites, but it does not quantify those jobs or document whether or not those jobs are held by members of the local community. At the same time, the Draft EIS notes that between 2800 and 16,800 construction jobs will be created, and between 630 and 2700 permanent jobs will be created.

***Recommendation:***

We recommend that the Final EIS include a quantitative and qualitative comparison of the jobs held by the environmental justice communities at existing facilities – such as Piggyback Yard –



and the jobs to be created under each alternative. With effective programs in place, the project could create employment opportunities that would offset jobs lost by members of the environmental justice community at the Piggyback Yard and other impacted sites. The Final EIS should commit to developing recruitment, training, and job set-aside programs for environmental justice communities impacted by the project.

The Final EIS should also specify how the positive and adverse impacts to environmental justice communities differ among the alternatives. Particularly, the geographic area covered by Alternative 20 is much larger than that of Alternative 13; therefore, a larger number of residents would be affected (Appendix B). Further, the number of jobs created by Alternative 20 is listed as 16,800, as compared to 4000 for Alternative 13. The document should differentiate the impacts and mitigations accordingly.

### **Recreation Plans**

The recreation plan (Appendix B) lists proposed recreation features, including “wood deck with railing, benches, interpretive signage, and trash receptacles.” EPA has developed a Comprehensive Procurement Guideline program in an effort to promote the use of materials recovered from solid waste. EPA also supports the use of the Sustainable Materials Management approach to using and reusing materials more productively over their entire lifecycles (<http://www.epa.gov/smm/basic.htm>). The features of the recreation plan provide an opportunity to consider the durability and environmental impact of materials used in those features.

### **Recommendation:**

We recommend that the Corps work with the partner agencies responsible for maintenance of recreation areas and establish a commitment to using a Sustainable Materials Management approach, when selecting materials for the recreation plan, and consulting the Comprehensive Procurement Guidelines ([www.epa.gov/waste/conservation/cpg/products/index.htm](http://www.epa.gov/waste/conservation/cpg/products/index.htm)) for product recommendations.

### **Detailed Comments and Corrections**

Page 3-26: The first full paragraph states that pollutant loading from non-point sources “far exceeds point sources.” This is incorrect and inconsistent with other statements in this section which correctly describe stormwater runoff as the prominent source of water quality degradation in the Los Angeles River. It appears that this paragraph may be erroneously considering stormwater to be a non-point source. Pursuant to Clean Water Act regulations, stormwater runoff is considered to be a point source, regulated by NPDES permit programs.

Page 3-73: Some details in the 2<sup>nd</sup> paragraph’s description of the San Fernando Valley Superfund sites should be revised. The shallow groundwater contamination mentioned in the second paragraph includes VOCs and chromium. For chlorinated VOCs, the basinwide Remedial Investigation referred to in the third sentence is complete, and remedies to address VOC contamination have been operating since 2000. Investigations of chromium contamination are ongoing.

Page 3-80: The last paragraph’s description of the City’s stormwater system is incorrect, as not all flows entering the system are untreated. Although it is true that most flows from the stormwater system enter receiving waters without treatment, the City operates “low-flow diversions” in selected locations which direct dry weather urban runoff from the stormwater system to the sanitary sewer system for treatment.



A few of these diversions capture flows in the City's stormwater system that would otherwise be directed discharged to the LA River.

Page 4-3: The "increase passive recreation" objective is discussed as a secondary objective in other areas of the document, but is counted here with the primary objectives. It is also has a typographical error listing it as the second number "2" objective. This section should be clarified to mirror the discussion of objectives in other areas of the document.

Page 5-39: (bottom of page) Note that the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit was renewed in November 2012 and, among other requirements, includes new provisions related to new development/redevelopment projects.

Page 5-40 section 5.4.2, 13<sup>th</sup> bullet: This description of violations of regulatory standards is apparently intended to address Clean Water Act regulatory matters, but is incomplete. We'd suggest revising it to "Caused regulatory standards to be exceeded, as defined in the applicable NPDES permit or water quality standards in the Los Angeles Regional Water Quality Control Board's Basin Plan."

Page 5-41: The discussion of TMDLs in the 2<sup>nd</sup> paragraph should recognize that TMDL provisions have been incorporated into the renewed LA County MS4 permit.

Page 5-71, 2<sup>nd</sup> full paragraph: This paragraph describes multiple rail lines located at the Piggyback Yard, including passenger rail lines. The last sentence mentions the impact from a "reduction in railyard capacity." It would help to clarify whether this would have any impact on passenger rail lines.

Page 5-96, HTRW: In the vicinity of reaches 1-4, it is possible that any groundwater encountered by construction activities will be contaminated with VOCs and/or chromium. Whether groundwater is encountered will depend on the depth of excavations and local hydrogeology.

Page 5-97, Approach to HTRW Impacted Groundwater: This should clarify that the SFVSS site sponsor is responsible for management of contaminated groundwater encountered during construction activities.

Page 5-101, first line: It is unclear whether this is intended to refer to wastewater treatment requirements of the applicable "POTW" (Publicly owned treatment works or municipal wastewater treatment plants). Reference to the applicable "RWQCB" is unclear, as there is only one RWQCB in the study area.

Page 6-31: The discussion of de-watering activities should make it clear that treatment and disposal of contaminated groundwater will be necessary if contamination is encountered during de-watering activities.

#### Appendix K, Page 15: Regarding San Fernando Valley Superfund Site (SFVSS)

- First paragraph, fourth and fifth sentences: "It is currently being remediated by the USEPA via a large series of pump and treatment wells that are strategically located amongst the plume. One such set of wells, the Pollock Well Field, is located approximately less than 1/2 mile northwest from the Taylor Yard G1 and G2 properties."  
The Los Angeles Department of Water and Power (LADWP) operates the wellhead treatment project in the Pollock Well Field. With the existence of LADWP's project, EPA concluded that a Superfund remedy is unnecessary.

- Second paragraph states that dewatering likely will require pump-treatment and disposal of water. If it is anticipated that contaminated groundwater will be encountered, we recommend that disposal or discharge requirements be identified before determining appropriate treatment.
- Third paragraph discusses the likelihood that contaminant concentrations at the outer edges of the SVFSS plume are lower than concentrations in the rest of the plume. While this characterization is accurate, the information could be misleading. Recent data show the presence of VOCs and chromium near the river at concentrations that exceed safe drinking water standards. We recommend the addition of a statement to clarify that concentrations of VOCs and chromium in this portion of the project area could still exceed drinking water standards and disposal or discharge standards.



## MIKE GATTO

ASSEMBLY APPROPRIATIONS CHAIR  
ASSEMBLYMEMBER, FORTY-THIRD DISTRICT

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## Assembly California Legislature

## JIMMY GOMEZ

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September 26, 2013

Lieutenant General Thomas Bostick  
Commanding General  
United States Army Corps of Engineers  
441 G Street NW  
Washington, DC 20314-1000

**RE: Los Angeles River: Los Angeles River Ecosystem Restoration Feasibility Study, Alternative 20**

Dear Lieutenant General Bostick,

I am writing to strongly urge the United States Army Corps of Engineers to select Alternative 20 as the preferred alternative to restore the Los Angeles River. Alternative 20 provides the most extensive restoration of the Los Angeles River and includes restoration measures across the entire river system, to maximize the positive impact on disadvantaged communities throughout the Los Angeles area and create a more functional and interconnected watershed.

The City of Los Angeles has been working closely with the US Army Corps of Engineers for more than seven years to develop a plan to restore and revitalize the Los Angeles River. Out of its work with the City of Los Angeles, the Army Corps has recently released the *Los Angeles River Ecosystem Restoration Feasibility Study*, which provided several alternatives for habitat and stream restoration along 11 miles of the LA River ecosystem to revive the ecological vitality and quality of the river.

I was disappointed to learn that the Army Corps has identified Alternative 13, one of the alternatives with minimal restoration projects, as their preferred alternative. Alternative 20 includes several crucial restoration projects and hydraulic adjustments to the LA River which are excluded in Alternative 13. For example, Alternative 20 includes improvements to the Verdugo Wash and creates the Los Angeles River State Historic Park. Both improvements would add several acres of wetlands to the River system, reestablishing connectivity of historic riparian strand and freshwater marsh habitat to support increased populations of wildlife and enhance habitat connectivity within the Los Angeles Area. These improvements would also create increased connectivity for bikers and pedestrians utilizing the LA River recreation areas. Additionally, although Alternative 20 will cost more, it will also provide over 10,000 more jobs than Alternative 13 and maximizes restoration investment, with the lowest percentage of construction cost attributable to real estate purchase. Improvements will also reach further into the City of Los Angeles, providing greenspace for disadvantaged communities with little

access to parks and open space. Simply, Alternative 13 doesn't offer an alternative; it puts off the vast majority of work which must be done to restore the Los Angeles River, thereby removing the opportunity to lower the ultimate Federal, state and local cost of the restoration by consolidating work and projects.

For these reasons, I urge you to support Alternative 20 to maximize our investment dollars and restore the Los Angeles River as a functional ecological system and a community resource. Please feel free to contact me or my staff, Katerina Robinson, at (916)319-2043 if you have any further questions.

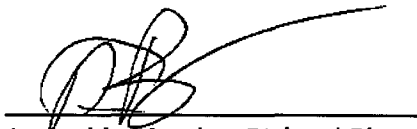
Sincerely,



Mike Gatto  
Assembly Member, 43rd District  
cc:



Jimmy Gomez  
Assembly Member, 51st District



Assembly Member Richard Bloom, AD-50



Assembly Member Raul Bocanegra, AD-39



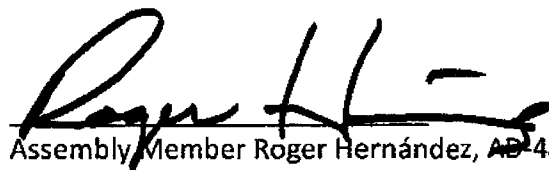
Assembly Member Ian Calderon, AD-57



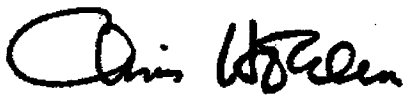
Assembly Member Ed Chau, AD-49



Senator Lou Correa, SD-34



Assembly Member Roger Hernández, AD-48




Assembly Member Chris Holden, AD-41



Senator Ted Lieu, SD-28



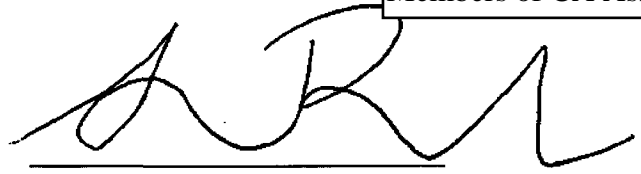
Senator Carol Liu, SD-25



Assembly Member Adrin Nazarian, AD-46



Assembly Member Alex Padilla, AD-20



Assembly Member Anthony Rendon, AD-63



Assembly Member Roderick Wright, AD-35



Senator Fran Pavley, SD-27



Assembly Member Al Muratsuchi, AD-66

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# California State Senate

SENATOR  
KEVIN DE LEÓN  
CHAIR

SENATE APPROPRIATIONS COMMITTEE  
TWENTY-SECOND SENATE DISTRICT

De León  
COMMITTEE  
APPROPRIATIONS  
ENERGY, UTILITIES &  
COMMUNICATIONS  
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ORGANIZATION  
PUBLIC SAFETY  
JOINT COMMITTEE  
LEGISLATIVE BUDGET



November 5, 2013

Lieutenant General Thomas Bostick  
Commanding General  
United States Army Corp of Engineers  
441 G Street NW  
Washington, DC 20314-1000

## **RE: Los Angeles River: ARBOR Study – Support for Alternative 20 (RIVER)**

Dear Commanding General Bostick:

I am writing to strongly urge the United States Army Corps of Engineers to select Alternative 20 – Riparian Integration via Varied Ecological Reintroduction (RIVER) – as the preferred alternative to restore the 11 miles of the Los Angeles River included in the “Area with Restoration Benefits and Opportunities for Revitalization (ARBOR)” reach study and detailed in the draft Integrated Feasibility Report (IFR). I greatly appreciate the efforts of the City of Los Angeles and the U.S. Army Corps of Engineers to develop a plan to restore and revitalize the Los Angeles River that would be consistent with the goals of the City of Los Angeles’ Los Angeles River Revitalization Master Plan for the river. As a strong proponent of efforts to restore the Los Angeles River, I support Alternative 20 (RIVER) as it provides the most extensive restoration of the river and integration into adjacent neighborhoods, the majority of which I represent.

Spurred by the efforts of individuals and organizations, such as the Friends of the Los Angeles River, Los Angeles has witnessed a strong and growing interest to restore and revitalize the river to a more ecological natural state. These efforts have coincided with a greater awareness about the lack of open space in many nearby neighborhoods, which would be well-served by a restored and revitalized Los Angeles River. Unfortunately, the City of Los Angeles has the unfortunate distinction of being one of the largest cities in the United States with the least amount of park and open space.

In response to the glaring need for additional park space in Los Angeles, I have pushed forth state policies to support efforts to provide sorely needed open space and help revitalize the river. My efforts have included helping to channel necessary state funding to key sites along the river, including \$21 million for the development of the Los Angeles State Historic Park.





**Commanding General Bostick --- ARBOR Study Support for Alternative 20**  
**November 5, 2013**  
**Page 2 of 3**

Additionally, I authored legislation, California Senate Bill 1201 (De Leon), that codifies the river's status as a navigable water of the state protected under the State Constitution, which was signed into the law in 2012. This legislation, cited in the ARBOR study, is an important effort by the State of California to recognize the importance of the Los Angeles River as more than just a flood control system.

Alternative 20 (RIVER) best represents the vision of the people of Los Angeles for the Los Angeles River. Unlike the other alternatives, Alternative 20 includes connections to significant key sites along the river, including the Los Angeles State Historic Park and the Verdugo Wash. The Los Angeles State Historic Park, in particular, is a critically important site in the community of Chinatown in downtown Los Angeles. The Los Angeles State Historic Park, known locally as the "Cornfield," was the result of a historic partnership between the Latino and Asian American communities in my district that formed the coalition Chinatown Yard Alliance to prevent the development of this 32-acre site into industrial warehouses. The acquisition of this land by the state of California is renowned as one of the most significant environmental justice victories in Los Angeles, and has served as a catalyst for the revitalization of the Los Angeles River. Selecting an alternative that fails to include this key site would be a disservice to the community. Alternative 20 is the only alternative incorporating the Los Angeles State Historic Park in the revitalization of the river, providing for the restoration of wetlands with a terraced connection from the park to the mainstem of the river.

While other alternatives may be less expensive, the benefits of Alternative 20 (RIVER) best meet the needs of Los Angeles. Alternative 20 (RIVER) ensures the greatest increase in habitat restoration, connection to the neighborhoods, connectivity along the 11 mile stretch of the river, and potential for 10,000 more jobs than Alternative 13. As such, it would be a great disappointment for the US Army Corps to move forward with a preference for Alternative 13, an inadequate representation of the needs and desires of the community.

For these reasons, I urge you to support ARBOR study Alternative 20 (RIVER) to ensure we maximize our federal and local investment dollars and restore the Los Angeles River as a functional ecological system and a resource to the local community. Please feel free to contact me or Nidia Bautista on my staff at (916) 651-4022, if you have any further questions.

Sincerely,



**KEVIN DE LEÓN**  
**Twenty-Second Senate District**

**Commanding General Bostick --- *ARBOR Study Support for Alternative 20***  
**November 5, 2013**  
**Page 3 of 3**

cc: Honorable Diane Feinstein, United States Senator  
Honorable Barbara Boxer, United States Senator  
Honorable Xavier Becerra, U.S. House of Representatives (CA – 34<sup>th</sup> District)  
Honorable Lucille Roybal-Allard, U.S. House of Representatives (CA – 40<sup>th</sup> District)  
Honorable Adam Schiff, U.S. House of Representatives (CA – 28<sup>th</sup> District)  
Honorable Jimmy Gomez, California State Assembly (51<sup>st</sup> District)  
Honorable Eric Garcetti, Mayor of Los Angeles  
Honorable Gilbert Cedillo, Los Angeles City Council, 1<sup>st</sup> District  
Honorable Mitch O'Farrell, Los Angeles City Council, 13<sup>th</sup> District  
Nancy Sutley, Chair, White House Council on Environmental Quality (CEQ)

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# California State Senate

SENATOR  
FRAN PAVLEY

TWENTY-SEVENTH SENATE DISTRICT



Pavley  
NATURAL RESOURCES  
CHAIR  
ENERGY, UTILITIES &  
COMMUNICATIONS  
ENVIRONMENTAL QUALITY  
HEALTH  
TRANSPORTATION & HOUSING

September 27, 2013

Lieutenant General Thomas Bostick  
Commanding General  
United States Army Corp of Engineers  
441 G Street NW  
Washington, DC 20314-1000

RE: Comment in support of Alternative 20 (the "RIVER" alternative)  
Draft Integrated Feasibility Report, Los Angeles River Ecosystem Restoration Feasibility Study

Dear Lt. General Bostick,

I appreciate and commend the ongoing efforts of the U.S. Army Corps of Engineers, Los Angeles District (Corps) on behalf of restoring and revitalizing the Los Angeles River (river). We share the vision of a river restored to its vital and historic roles of providing riparian habitat and ecosystem support, connectivity between ecological zones, and numerous recreational, economic and cultural opportunities while still maintaining existing flood control capabilities and public safety. My state senate district includes the Sepulveda Basin and the headwaters of the river in Canoga Park, and last year the State Legislature passed the resolution I authored, SCR 101, honoring the commitment and leadership demonstrated by many, including the Corps, in the creation of parks and the restoration of natural habitats along the river and its San Fernando Valley tributaries. I am a long-time supporter of efforts to help re-connect the public with the river, including the kayak tours the last few summers that the Corps was an important partner in. As you know, there is long-standing state support for river restoration efforts, such as the development of adjacent "pocket parks" and the relatively recent creation of two new units of the state park system along the river.

I am writing today to comment on the recently-released Draft Integrated Feasibility Report (report) of the Los Angeles River Ecosystem Restoration Feasibility Study. I join the entire Los Angeles City Council, the Los Angeles River Corporation, political leaders and numerous organizations devoted to the river in believing that Alternative 20 – the more comprehensive "RIVER" alternative – should be the preferred choice of the Corps, not the tentatively selected Alternative 13. Alternative 20, as the Corps acknowledges, meets the "best buy" criterion and provides for maximum river ecosystem restoration at sites including the Arroyo Seco confluence, the Los Angeles State Historic Park ("Cornfields"), Piggyback Yard, the Bowtie and G-2 parcels of the Taylor Yard, and the Verdugo Wash confluence. The report itself acknowledges that future restoration both upstream and downstream of the 11 mile "ARBOR" reach of the river studied is hindered by existing urbanization. Concrete can be removed, water velocities reduced and ecosystems restored in the Glendale Narrows reach that may not be possible elsewhere. It is therefore imperative that the opportunities presented by Alternative 20 be seized. While Alternative 20 is more costly than Alternative 13, the Corps' own projections indicate that significantly more jobs and cumulative impact of redevelopment long-term economic activity are associated

with Alternative 20. I urge the Corps to reconsider its tentative selection of Alternative 13 in favor of Alternative 20.

As chair of the Senate Natural Resources and Water Committee and a member of the Senate Environmental Quality Committee, I am aware of the daunting environmental challenges facing the restoration of the river. These challenges are not insurmountable, however, and choosing Alternative 20 is the best step forward to achieving a sustainable river while protecting public safety.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Fran Pavley". The signature is written in dark ink on a light-colored background.

Fran Pavley  
Senator, 27<sup>th</sup> Senate District

cc: Colonel Kimberly M. Colloton, Commander, U.S. Army Corps of Engineers, Los Angeles Dist.  
Josephine Axt, Ph.D., Chief, Planning Division, U.S. Army Corps of Engineers, Los Angeles Dist.  
Supervisor Zev Yaroslavsky, County of Los Angeles  
Mayor Eric Garcetti, City of Los Angeles  
Members, Los Angeles City Council  
Gary Moore, City Engineer, City of Los Angeles



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HIGHER EDUCATION

# Assembly California Legislature

**RICHARD BLOOM**

CHAIR, BUDGET SUBCOMMITTEE NO. 3 ON RESOURCES & TRANSPORTATION  
ASSEMBLYMEMBER, FIFTIETH DISTRICT

**Bloom**

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**E-MAIL**  
assemblymember.bloom@assembly.ca.gov

October 17, 2013

Mr. Josephine R. Axt, Ph.D.  
Chief, Planning Division, U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Ms. Axt:

I strongly support Alternative 20 as we take the next step in revitalizing and restoring the natural and historic heritage of the Los Angeles River. As someone who has lived near the river for almost my entire life and recently kayaked the river, I am intimately aware of the environmental and recreational benefits of this project.

Only Alternative 20 embraces the vision of an urban waterway that supports wildlife habitat and becomes accessible and usable as a recreational opportunity for everyone in the region, regardless of socioeconomic status. Alternative 20 connects the restored river to the Los Angeles State Historic Park - a key component providing the urban population, particularly the economically disadvantaged, with access to green open space and a natural wildlife corridor. Additionally, Alternative 20 sets in motion the plan for greater federal and local funding coordination that will increase public access through various channel terracing and other improvements. Absent these initiatives, much of the river will still be unconnected to the community which is contrary to the commitment of the federal government's Urban Waters Federal Partnership as well as the primary goals and purpose of the restoration project.

For decades, the surrounding communities have worked hard to make the seemingly impossible a reality. But now, much of that reality rests on the decision before the U.S. Army Corps of Engineers. For these reasons, I ask that you do all that you can, support Alternative 20, and make this project the model urban waterway revitalization project the best in the country.

Thank you for your time and consideration of this matter. Please do not hesitate to contact me if you need anything further.

Sincerely,

RICHARD BLOOM  
Assemblymember, 50<sup>th</sup> District

**RECEIVED****OCT 25 2013****PLANNING DIVISION**

From: Harris, Scott P.@Wildlife [<mailto:Scott.P.Harris@wildlife.ca.gov>]  
Sent: Thursday, November 07, 2013 9:17 AM  
To: Jones, Erin L SPL; Birosik, Shirley@Waterboards  
Cc: Schmoker, Kelly@Wildlife  
Subject: [EXTERNAL] RE: LA River Feasibility Study/EIS/EIR - comments (UNCLASSIFIED)

Hi Erin,

I did not have any substantive comments other than making sure whoever performs the work touch bases with CDFW to determine if they need a Lake or Streambed Alteration Agreement. Sometimes these types of projects involving the COE and local governments, public works, etc. lead to regulatory confusion Down the Road depending on who does the work, owns the property, etc.

1

-----Original Message-----

From: Harris, Scott P.@Wildlife [<mailto:Scott.P.Harris@wildlife.ca.gov>]  
Sent: Tuesday, October 01, 2013 11:19 AM  
To: Jones, Erin L SPL  
Subject: [EXTERNAL] RE: LA River EIS (UNCLASSIFIED)

Hi Erinn,

I had a question after reading through some sections of the NEPA/CEQA doc for the LA River Restoration Project:

In Volume one Page 5-51 of the Integrated Feasibility Report, I saw a discussion of impacts to waters of the U.S. described under the impact section. Is there a similar discussion of impacts to waters of the state? I did see a reference to CDFW and the Lake or Streambed Alteration Agreement (LSSA) requirement. I know folks in our streambed program will be wondering what these impacts will be and who will be contacting them for the LSAA for the actual work. Will the City if LA and/or LA County be doing the initial restoration work?

2

Also I know shorebirds forage on the algae covered areas of the concrete lined bed of the LA Rive in some stretches. Will this foraging habitats be lost following restoration of the various stretches that may provide this open habitat and is this canalized in the document? Thank you.

3



DEPARTMENT OF PARKS AND RECREATION  
Angeles District  
1925 Las Virgenes  
Calabasas, Ca. 91302

Major General Anthony L. Jackson, USMC (Ret), *Director*

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Cory of Engineers, Los Angeles District  
PO Box 532711  
ATTN: Ms. Erin Jones, CES-PD-RN  
Los Angeles, CA 90053-2325

**RE: Draft Los Angeles Ecosystem Restoration Integrated Feasibility Report  
(DIFR) for the Los Angeles River Ecosystem Restoration Feasibility Study,  
Los Angeles County, California**

Dear Dr. Axt:

The California Department of Parks and Recreation (California State Parks) has reviewed the above-referenced "Los Angeles River Project" DIFR and appreciates the opportunity to comment.

California State Parks stands with our partner park agencies, the National Park Service and the Santa Monica Mountains Conservancy, in its strong support for Alternative 20. The Los Angeles River Project presents a historic opportunity to reconnect the City of Los Angeles with its natural heritage by linking existing public open spaces, by providing habitat connectivity between the mountains and the river floodplain, and by promoting opportunities for passive outdoor recreation in the most park-poor metropolis in the United States. The community consensus-building and momentum that have resulted from the feasibility study and from other planning efforts over many years call for a bold vision to begin the restoration of what was once a vibrant ecosystem of mountains, rivers and coastal lowlands of almost unequalled biodiversity.

Over the past 12 years, California State Parks has invested over \$150 million dollars to bring nature to the city by acquiring and developing three parks in urban Los Angeles: Rio de Los Angeles State Park, Los Angeles State Historic Park and the Baldwin Hills Scenic Overlook. Los Angeles State Historic Park and Rio de Los Angeles State Park were designated by Proposition 12 as Los Angeles River parkway projects.

In partnership with local communities, we have succeeded in preserving over one hundred acres of open space in the most park-poor region of the most park-poor city in the nation. These parks have not only attracted thousands of visitors every year, but have contributed to the economic revitalization of the surrounding communities. California State Parks' investment in these properties indicates that they rise to the level of statewide significance. We further recognize the Los Angeles River as a resource of statewide and national significance due to its cultural and historic role in the



Josephine R. Axt, Ph.D.  
November 18, 2013  
Page 2

transformation of Los Angeles from a frontier town to the second largest metropolis in the United States. We believe in the river's potential to transform the city once more through positive economic and environmental impacts that would benefit the entire Los Angeles region.

Los Angeles State Historic Park and Rio de Los Angeles State Park are innovative urban parks that serve low-income, park-poor communities that fought for equal access to parks and green space that are more available to more affluent Los Angeles neighborhoods. As reported by the City Project in *Dreams of Fields: Soccer, Community, and Equal Justice*, the community within a five mile radius of Los Angeles State Historic Park is 68% Latino, 14% Asian, 11% non-Hispanic white, and 4% African American. The population surrounding the park is disproportionately low income, with 30% of the residents living in poverty compared to 14% for the State of California as a whole. The community within a five mile radius of Rio de Los Angeles State Park reflects a similar socio-economic demographic with a 56% Latino, 17% Asian, 20% non-Hispanic white, and 4% African American population. Twenty seven percent of that population lives in poverty, with a median annual household income at just 69% of that for the State.

Los Angeles State Historic Park revives the forgotten history of Los Angeles from Native American times to the present, providing passive and active recreational opportunities in this rare swath of open space in the heart of the city. Rio de Los Angeles State Park features cutting edge wetlands restoration, much-needed athletic fields and community activities. Both of these parks are included as part of the National Park Service Rim of the Valley (ROTV) Corridor Special Resource Study, along with significant acreage in the Verdugo Mountains, also under the stewardship of California State Parks. During the public scoping process for the study, the national significance of the Los Angeles River and adjoining parklands, as well as the wildlife and habitat linkages they provide, was highlighted as a top concern by participants. Public comments received on the preliminary alternative concepts for the ROTV study strongly supported Alternative C (Connecting Urban Parks – SMNRA Boundary Adjustment), particularly in regard to the inclusion of the Los Angeles River and Arroyo Seco Corridors.

Alternative C of the ROTV Study complements existing Los Angeles River revitalization efforts and river parkway projects, of which Los Angeles State Historic Park and Rio De Los Angeles State Park are primary examples. National Park Service technical assistance and leadership in cooperative conservation efforts, coupled with acquisition and management capabilities, would be beneficial as a variety of city, county, state, joint powers, and local non-profit agencies currently work to leverage resources and connect open space along the river. The parcel G-2, currently held by Union Pacific, has long been considered the "crown jewel" in the emerald necklace of Los Angeles River parkway projects. Federal assistance could prove invaluable in the acquisition



Josephine R. Axt, Ph.D.  
November 18, 2013  
Page 3

and protection of this critical Los Angeles River connection. Alternative 20 is fully consistent with the concerns demonstrated by a large portion of the public in the ROTV study, and there is a tremendous opportunity for the Corps to build on this momentum and offer leadership in this comprehensive restoration effort.

After 12 years of extensive planning and public participation, California State Parks is ready to deliver on its commitment to the community and construct the full 32 acres at Los Angeles State Historic Park, beginning in early 2014. The park construction will happen in tandem with the development of the La Noria Water Wheel project, funded by the Annenberg Foundation, adjacent to the park. Echoing the historic waterwheel once located on North Broadway Street, the La Noria project will pump water from the Los Angeles River to the seasonal wetland portion of Los Angeles State Historic Park. The project will re-establish the site's physical connection to the historic Los Angeles River flood plain, and this hydrological connection to the river fulfills the vision laid out in the park's general plan, as stated in the *Declaration of Purpose*:

*"The purpose of Los Angeles State Historic Park is to provide the public with a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles, with an emphasis on its evolution to an economic and industrial metropolis of the 21<sup>st</sup> Century with extraordinary influence throughout the world. The park will contribute to the emerging Los Angeles River Greenway, stretching from the San Gabriel Mountains to the Pacific Ocean. The park will bring a wide range of visitors together to examine and experience the complete story of Los Angeles. It will be a sanctuary from the dense, urban environment that surrounds it. The park will connect abstract historical and social patterns to the personal experiences of Angelenos and visitors from the city, the state, the nation, and the world."*

California State Parks is working in partnership with the City of Los Angeles and the Department of Toxic Substances Control on clean-up of the Bowtie parcel of Rio de Los Angeles State Park to park standard, which has already been identified by the Army Corps through the Los Angeles River Ecosystem Restoration Feasibility Study as the primary location for a demonstration project. The 18.5 acre parcel is large enough to achieve substantial restoration benefits and offers the potential to incorporate riparian bank-to-bank hydrological and habitat connections. The parcel's use for naturalized open space is consistent with the general plan for Rio de Los Angeles and consistent with the Los Angeles River Revitalization Master Plan's designation of the parcel as habitat/open space within the "Taylor Yard Opportunity Area." These projects present a tremendous opportunity for leveraging resources through extended partnerships with the Army Corps and project components offered in Alternative 20. Accordingly, we fully support the funding and implementation of Alternative 20, specifically the direct connection of Los Angeles State Historic Park and a portion of Rio de Los Angeles to the Los Angeles River.



Josephine R. Axt, Ph.D.  
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### Biological Resources

Riparian and wetland habitats are among those most impacted, due to damage and conversion associated with transportation, agriculture, water infrastructure and other development. Water quality degradation is also typical as the pollution from upgradient areas collects in these habitats. Yet, riparian and wetlands habitats are vital for the health of local fish and wildlife populations, and provide important resources for feeding, breeding, and resting. They also provide key corridors to local and large-scale animal movement that are necessary to avoid inbreeding depression and local extinctions.

Many unique special status species are associated with riparian and wetland habitats and would benefit from restoration of the Los Angeles River. Alternative 20 is preferable because it provides an additional 131 acres of restored and higher quality habitat compared to Alternative 13.

The long-term health of many fish and wildlife populations is dependent upon their ability to access both local and regional resources for food, mates, and sanctuary. Equally important is access to refuges where animal subpopulations can replenish their numbers and genetic diversity after bouts of disease, extreme weather, and decreased resource availability. These resources are even more crucial in intensely developed areas like Los Angeles, where the isolated patch of open space has even more value due to its relative rarity and the convoluted path to reach it. Adjacent development impacts, also known as edge effects, put greater pressures on native species through increased disturbance, disease, exposure to toxins, invasive species impacts and general habitat degradation. Restoration of the Los Angeles River would restore a key artery to the historic system of animal movement in the region and would not only provide increased options for existing wildlife, but vastly improve the future health and expansion of these populations.

The importance of the Los Angeles River for animal movement is supported by National Park Service's ongoing research tracking carnivores through the Santa Monica Mountains. The Park Service has identified the Los Angeles River as an important corridor for animal movement. Mountain Lion P22, among others, would benefit by having access to the Verdugo Hills via the restoration of the Verdugo Wash proposed only by Alternative 20. We believe that Alternative 20 is clearly the preferred alternative for maximizing animal movement and habitat connectivity. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. It provides the greatest range of connectivity by providing links to the Verdugo Mountains and associated property managed by California State Parks, Santa Monica Mountains Conservancy and the City of Glendale. It also ensures that the Elysian Hills would be connected to the Los Angeles River via Los Angeles State Historic Park. These benefits are not provided by other project alternatives. Alternative 20 therefore provides the best opportunity to protect and enhance existing animal populations at a regional level in both the short and long term.



Josephine R. Axt, Ph.D.  
November 18, 2013  
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The DIFR clearly underlines the importance of maximizing habitat linkages (Appendix G, Section 7.1.2):

*"In order to benefit the biological integrity of a landscape, corridors should be restored to allow for dispersal between habitat areas. More corridors equal more routes to suitable habitat, creating more opportunities for dispersal. A complex network of nodes and corridors is therefore critical to restoration in an urban environment, as suitable habitat often remains unused if isolated (Hanski & Thomas 1994)."*

2

In Sections 3.5.4 and 5, the DIFR does not adequately discuss plant and animal species and unique habitats considered sensitive by the State of California, as required by the California Environmental Quality Act (CEQA). These include California Species of Special Concern, California Fully Protected, and species considered local endemics, among other designations. Just one example of this oversight is the silvery legless lizard (*Anniella pulchra pulchra*). This species is identified as potentially present, and it is a California Species of Concern, yet there is no discussion of how potential impacts to this species could occur during ground disturbing activities, nor is there discussion of how potential impacts be avoided.

We recommend inclusion of the following measures in the section on Best Management Practices for Biological Resources:

- Conduct standard preconstruction surveys for special-status plants at the time of year when they are most likely to be in bloom or most visible to determine presence
- Conduct special-status animal clearance surveys just prior to construction to relocate animals out of harm's way.

3

The CHAP scoring and CE/ICA does not capture the regional importance of the project. We are concerned that it appears that total cost is the primary reason Alternative 20 has not been selected. This appears to be in part due to consideration of the relationship of cost to total acres restored or Habitat Units created, rather than the ecological *value* of the restored acres or resource areas made accessible. Alternative 20 not only significantly increases the *quantity* of habitat restored compared to Alternative 13, 719 vs. 588 acres, respectively, but creates *and* provides greater access to more higher *quality* habitat. We would like to reference and reiterate Santa Monica Mountains Conservancy's November 5, 2013 comment letter which clearly outlines these concerns. (See the *Importance of Biodiversity, Cost Effectiveness and Plan Selection* sections).

4

Josephine R. Axt, Ph.D.  
November 18, 2013  
Page 6

Specifically:

- Alternative 13 and 20 give the same credit for 113 acres of restoration associated with the Piggyback Yard, yet the restoration and associated ecological benefits are significantly greater under Alternative 20.
- At the Los Angeles State Historic Park ("Cornfield") location, Alternative 20 has significant ecological improvements over Alternative 13.
- Alternative 20 is identified as a "Best-Buy" in the CE/ICA, and is the only alternative that provides linkages to the Verdugo Mountains and Elysian Hills.
- Alternative 20 is efficient, the most complete, the most effective, and the best alternative at recreating natural processes that are needed to facilitate a self-sustaining system within the project area and throughout the region over the *long term*.
- Alternative 20 best complies with the goal of the Water Resources Development Act of 2007 to develop a plan "*consistent with the goals of the Los Angeles River Revitalization Master Plan published by the city of Los Angeles...*"
- As discussed in *Appendix G, Section 7*, three key project benefits have been excluded from the CHAP analysis: habitat connectivity, hydrologic and hydraulic connectivity of the Los Angeles River to its floodplain and human benefit.

Since the basis for the tentative selection of Alternative 13 is the relation of the total Habitat Units resulting from each alternative divided by the total cost, it is unacceptable to exclude habitat and hydraulic and hydrological connectivity from the equation. Incorporation of these factors must occur to provide clarity on the true cost/benefit relationship of the four project alternatives. Potential approaches to modifying the calculation of HUs could include:

- Differentiation of the relative ecological benefits of the restored habitat via modifiers to determine the value of the final restored area.
- Quantification of acres of significant habitat made available via corridor connections.
- Quantification of cumulative length of corridors connected or created or percent increase of corridors provided as an HU input.
- Weighting of HU outputs to consider direct human benefits. Specifically, building upon past investments in the project area, better connecting existing open space areas to the project area, quantified by acres or annual visitors, and direct economic benefits as calculated in the DIFR.

### Cultural Resources

Los Angeles State Historic Park is designated as Los Angeles Historical Cultural Landmark (HCM) No. 82 River Station Area/Southern Pacific Railroad. Throughout the DIFR document, the property is referred to as the "Cornfields." Although we understand

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that this was a previous nickname for the property, the origins of the name can only be traced back to the 1980's definitively, and thus does not represent the true historical designation. Instead, the study should refer to this area by the current name, Los Angeles State Historic Park, or the historical name, River Station. We believe that these are more appropriate terms and better connect the property to the origins of Los Angeles and the association with the Los Angeles River.

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The site is historically significant with known significant archaeological resources. Archaeological features in the park, along with adjacent historical properties, are indicative of the importance of this site with regard to the industrial development and the rapid urban expansion of Los Angeles. Cultural resource identification efforts are preliminary at this point, and it is unclear in the DIFR document at what point additional background research, field survey and evaluation are to be undertaken. As a result, it is nearly impossible to provide comment on resource identification level of effort and potential for adverse effects. There should be additional opportunities made available for public comment through the Section 106 process to ensure that project effects on historic properties are being accounted for.

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We recommend that additional background research efforts include analysis of ethnographic village locations in order to access the potential for encountering buried archaeological deposits within a region that experienced development early in time. This was an issue encountered during construction of the nearby Metropolitan Water District building where both Native American and historic-period archaeological materials were both anticipated and found based on previous research. As well, more detailed sources of historic map data, such as Sanborn fire insurance maps readily available at the City of LA Public Library, should be consulted, in addition to the historic topographic maps thus far consulted. Geomorphic studies of the historic configuration of the riverbed would also assist in determining the potential for encountering subsurface archaeological resources.

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Additional archaeological testing has been conducted at Los Angeles State Historic Park in recent years in association with planning efforts for the next phase of park development. All of these data can be made available to the cultural resources consultant conducting additional identification efforts for the Los Angeles River restoration project. Additionally, geophysical survey methods, including ground-penetrating radar, magnetometer, gradiometer and resistivity, have proven to be quite successful in identifying subsurface historic-period features at the park, and we encourage the use of these methods in resource identification efforts throughout the developed Los Angeles River project restoration area where historic map data suggest the possibility for encountering features.

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We believe it is preliminary to make any determinations on the level of potential for encountering cultural resources within all of the analyzed study reaches based on the limited background research conducted to date. As noted in the comments above, and

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Josephine R. Axt, Ph.D.  
November 18, 2013  
Page 8

acknowledged in Section 5.6.4 in the DIFR, substantial additional research, testing, and evaluation will have to be conducted prior to any determination of effects from the proposed alternatives on historic properties with the study Area of Potential Effect (APE). We concur that development of a Programmatic Agreement will help to address some of our concerns noted above.

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Thank you for the opportunity to comment on this project. Please contact Jamie King, Environmental Scientist at [Jamie.King@parks.ca.gov](mailto:Jamie.King@parks.ca.gov) or 818.880.0373, if clarifications are required.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Craig Sap', written over the printed name.

Craig Sap  
State Parks  
Angeles District Superintendent



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit

CA State Clearinghouse



Ken Alex  
Director

November 5, 2013

Jim Doty  
City of Los Angeles, Public Works, Engineering  
1149 S. Broadway, Suite 600  
Los Angeles, CA 90015

Subject: Los Angeles River Ecosystem Restoration Study  
SCH#: 2008121014

Dear Jim Doty:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 4, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

**Document Details Report  
State Clearinghouse Data Base**

**CA State Clearinghouse**

**SCH#** 2008121014  
**Project Title** Los Angeles River Ecosystem Restoration Study  
**Lead Agency** Los Angeles, City of

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**Type** EIR    Draft EIR

**Description** The primary purpose of the proposed project and alternatives considered in this study is to restore approximately 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles. This reach is identified as the "Area with Restoration Benefits and Opportunities for Restoration" reach, or ARBOR reach. Restoration would occur by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributary confluences and its historic floodplain, while maintaining existing levels of flood risk management. Opportunities for future regional connections to the habitat zones of the Santa Monica, San Gabriel, and Verdugo Mountains would also be created. A secondary purpose is to provide recreational opportunities consistent with the restored ecosystem within this 11 mile reach of the river.

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**Lead Agency Contact**

**Name** Jim Doty  
**Agency** City of Los Angeles, Public Works, Engineering  
**Phone** 213 485 5759  
**email**  
**Address** 1149 S. Broadway, Suite 600  
**City** Los Angeles      **State** CA    **Zip** 90015  
**Fax**

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**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long** 34° 5' 51.72" N / 118° 14' 22.62" W  
**Cross Streets** Zoo Dr. & Riverside Dr.; Fletcher Dr. & Riverside Dr.; E. Cesar E. Chavez Ave & Mission  
**Parcel No.**  
**Township** 1S      **Range** 13W      **Section** 9      **Base**

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**Proximity to:**

**Highways** I-5, 110, SR 2, 134  
**Airports** Burbank Bob Hope  
**Railways** Metrolink, Metro, UPRR  
**Waterways** Los Angeles River, Arroyo Seco, Verdugo Wash  
**Schools** Sonia Sotomayor Learning  
**Land Use** Various, residential, commercial, recreational, riparian

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Santa Monica Mountains Conservancy

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**Date Received** 09/20/2013    **Start of Review** 09/20/2013    **End of Review** 11/04/2013



## Los Angeles Regional Water Quality Control Board

November 15, 2013

Josephine R. Axt, Ph.D., Chief Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

### COMMENTS ON THE LOS ANGELES RIVER ECOSYSTEM RESTORATION FEASIBILITY STUDY DRAFT EIS/EIR

Dear Dr. Axt:

Thank you for this opportunity to comment on the draft EIR/EIS for the Los Angeles River Ecosystem Restoration Feasibility Study. As you may know, staff from the Regional Board participated on the Habitat Evaluation Team and provided input on the water quality aspects of the restoration alternatives.

The Regional Board strongly supports restoration work in the Los Angeles River for its water quality and habitat benefits. Restoration of the river as envisioned in the feasibility study will also help achieve a more reliable local water supply and implement the municipal stormwater permit through the increase in permeable area for stormwater retention and infiltration that will recharge groundwater. This is in line with the goals of the Greater Los Angeles County Integrated Regional Water Management Plan and with those of the State's Recycled Water Policy. The Los Angeles Region, its residents, biota, and visitors will all benefit from a restored Los Angeles River.

All of the action alternatives would result in varying degrees of water quality improvement. However, significantly greater water quality improvement would be achieved with alternative 20 due to the larger total area adjacent to the river proposed for restoration and the associated creation of permeable surfaces that would result as compared to the other alternatives. Alternative 20 would be more effective in aiding implementation of Total Maximum Daily Loads (TMDLs) that have been established for the Los Angeles River and its tributaries. This alternative would reduce storm water runoff and result in more storm water infiltration, leading to multiple benefits including augmentation of local groundwater supply and enhancement of multiple beneficial uses found in our Basin Plan including contact and non-contact water recreation, warm freshwater habitat, wetlands habitat, and wildlife habitat.

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*Specific Comments*

**Surface Water Quality, TMDLs, and Municipal Stormwater (MS4) Permits**

On Page 3-26, starting on Line 4, there is a discussion of the relative contributions of point and nonpoint sources to total pollutant loads in the greater Los Angeles area that incorrectly lumps stormwater runoff with nonpoint sources. Stormwater discharges are identified as point sources in federal law and regulation. Text should be revised to make this correction.

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On Page 3-27, the draft feasibility report states that the Los Angeles River metals TMDL is in the implementation phase. In fact, all four of the TMDLs established for the Los Angeles River and its tributaries are in the implementation phase. Implementation plans have been developed and actions initiated by responsible agencies for trash, metals and nutrients; water quality in the Los Angeles River relative to these contaminants is improving. An implementation plan to address elevated concentrations of bacterial indicators has also been developed by responsible agencies and it is anticipated that implementation will begin soon.

Requirements of these TMDLs have been included in the Los Angeles County MS4 (municipal separate storm sewer system) Permit that was reissued in November 2012 (Order No. R4-2012-0175). Discharges of storm water and non-storm water from Los Angeles County unincorporated areas and 84 cities within Los Angeles County are covered by this permit, which is the principal tool to regulate municipal storm water discharges from the urban areas of the Los Angeles River watershed. A similar permit covering the City of Long Beach is scheduled for reissuance in 2014 and will also incorporate requirements of these TMDLs. The TMDLs, MS4 permits, and other NPDES discharge permits in the Los Angeles Watershed are spurring improvements in the water quality of the river and its tributaries. These regulatory tools and the alternatives considered in the Feasibility Study can work synergistically to stimulate progress toward further water quality improvements and overall ecosystem restoration with the ultimate goal of fully supporting all designated beneficial uses of the river and its tributaries.

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A description of the municipal separate storm sewer system in the greater Los Angeles area begins on Page 3-80, Line 42, and includes a statement that water that enters the system is not treated or filtered. In many cases, this is true; however, a range of BMPs now exist at a number of locations that allow for some treatment of runoff before it enters the system. There are also a few dry-weather diversions installed, which completely remove water from the system and divert it to the sanitary sewer for treatment.

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Reference to the Los Angeles County MS4 Permit, for instance on Page 5-39, Line 42, should be corrected to reflect the new permit adopted in November 2012 (Order No. R4-2012-0175). This permit includes new provisions related to new development/redevelopment projects. On Page 5-41, Lines 5 through 7: We suggest adding the following language after the sentence discussing impacts of "Increased population density..." for clarification: However, measures within the Los Angeles County MS4 Permit are designed to curtail this potential.

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Regarding text on Page 5-41, beginning on Line 14, as stated previously, several TMDLs have been established and included in the Water Quality Control Plan for the Los Angeles Region (Basin Plan) for the Los Angeles River Watershed for metals (2007), fecal indicating bacteria (2010), nutrients (2003), and trash (2007) including all the reaches addressed in the feasibility

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study. These TMDLs have been incorporated into the renewed Los Angeles County MS4 permit.

With regards to the text on Page 5-48, Line 20 through 25, under the No Action Alternative and under all the alternatives considered, water quality will continue to improve due to the implementation of these TMDLs and the MS4 permits; however, the additional potential to improve water quality through implementation of the alternatives considered in the draft EIR/EIS would not be realized with the No Action Alternative. We suggest deleting the two sentences in Lines 20 through 22 and replacing with the following language: Under the No Action Alternative, water quality and quantity issues will not be addressed through actions proposed as part of the Los Angeles River Ecosystem Restoration project, while these issues will be addressed to varying degrees by implementation of the other proposed alternatives.

### Addressing Construction Impacts

Page 5-42, starting at Line 11, should include additional information on the likely requirements of a Section 401 certification and clarification that the projects may require enrollment in the State's General Permit for Discharges of Storm Water Associated with Construction Activity. For example, those lines might read instead:

"Clean Water Act Section 401 water quality certification and enrollment in the State of California's General NPDES Permit for Discharges of Storm Water Associated with Construction Activity would be required. Before land disturbance of one acre or greater occurs, or less than one acre but part of a larger common plan of development, the project proponent would need to complete and submit a Notice of Intent (NOI) to the State Water Resources Control Board (State Water Board) to obtain coverage under the permit. The SWPPP would be required by the construction permit would need to be prepared by a Qualified SWPPP Developer (QSD) before construction commences and the SWPPP along with a site map would need to be uploaded into the Stormwater Multiple Application and Report Tracking System (SMARTS). The project would then be granted a waste discharge number by the State Water Board upon payment of the required fee(s). Once a waste discharge number is assigned, Regional Board staff would schedule an inspection of the site to ensure the presence and completeness of the SWPPP, relevant records, and the effectiveness of the BMPs implemented at the site. to be obtained by the construction contractor would be developed in accordance with the guidelines of the State of California's NPDES General Construction Permit. A Clean Water Act Section 401 water quality certification would likely be a "technically conditioned" certification, which would identify conditions, or requirements, of certification that may include specific BMPs, water quality monitoring and reporting requirements, to ensure compliance with the applicable provisions of the Clean Water Act and State law. The SWPPP would contain a visual monitoring program, and a water quality monitoring program for non-visible pollutants to determine construction site BMP effectiveness. The SWPPP would list all BMPs to be implemented during construction activities for the control of erosion, siltation, and any ..."

Regarding the list of best management practices on Page 5-45, Lines 13 through 18, BMPs applicable in the Los Angeles Region including but not limited to working in the dry season, avoiding work immediately prior to or during precipitation events, and avoiding work during bird nesting seasons, should be added.

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On Page 6-31, Line 10, the discussion about treatment and disposal of contaminated groundwater should mention that coverage under a general NPDES permit for dewatering will need to be obtained from the Regional Board if groundwater from dewatering is discharged to surface waters.

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### Operational Impacts and Benefits

Page 5-41, Line 31. We suggest adding the following sentence directly after the last sentence of the paragraph: In recognition of the potential for higher water demand in the future, the State Water Resources Control Board adopted a Recycled Water Policy (2009) promoting the increased use of recycled water from local municipal wastewater sources as well as the increased capture and use of storm water. The policy also requires that management measures be developed to protect groundwater basin water quality, which may be impacted by the increase in recycled water use.

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On Page 5-107, the discussion of environmental justice should recognize the benefits to local communities from the improvement in water quality resulting from implementation of an action alternative.

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The discussion on Page 6-48, beginning on Line 28, should include recognition of the increased water quality and water supply benefits from alternative 20 through infiltration of additional runoff, leading to decreased stormwater runoff to receiving waters and increased groundwater replenishment.

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### References

Page 14-13, Lines 1 through 8: For citations to the Los Angeles Region Basin Plan and Los Angeles Region TMDLs, the Los Angeles Regional Board is the author. These references should be revised as follows:

Los Angeles Regional Water Quality Control Board, 2007. Total Maximum Daily Loads for Trash in the Los Angeles River Watershed. California Regional Water Quality Control Board, Los Angeles Region. August 9, 2007.

Los Angeles Regional Water Quality Control Board, 2003. Total Maximum Daily Loads for Nitrogen Compounds and Related Effects in the Los Angeles River and Tributaries. California Regional Water Quality Control Board, Los Angeles Region. July 10, 2003.

14

Los Angeles Regional Water Quality Control Board, 2007. Total Maximum Daily Loads for Metals in the Los Angeles River and Tributaries. California Regional Water Quality Control Board, Los Angeles Region. September 6, 2007.



Los Angeles Regional Water Quality Control Board, 2010. Total Maximum Daily Loads for Indicator Bacteria in the Los Angeles River Watershed. California Regional Water Quality Control Board, Los Angeles Region. July 9, 2010.

Los Angeles Regional Water Quality Control Board, 2010. Los Angeles River and Tributaries Metals TMDLs Final Implementation Plans. Accessed August 2012  
[http://www.waterboards.ca.gov/losangeles/board\\_decisions/basin\\_plan\\_amendments/technical\\_documents/bpa\\_59\\_2007-014\\_td.shtml](http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/bpa_59_2007-014_td.shtml)

Los Angeles Regional Water Quality Control Board, 1994. Water Quality Control Plan – Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, June 1994, as amended.

Duplicate references: Page 14-11, Line 21; North East Trees, 2006, is the correct reference for the Arroyo Seco Watershed Management and Restoration Plan. The duplicate reference on Page 14-3, Line 24; California State Water Resources Control Board, 2006, is incorrect and should be deleted. The report is available at  
[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/grants\\_loans/fundings/arroyo\\_seco%20wmrp.pdf](http://www.waterboards.ca.gov/losangeles/water_issues/programs/grants_loans/fundings/arroyo_seco%20wmrp.pdf) on the Los Angeles Regional Board's website.

In Line 25 on Page 5-39, "CERES, 2006" is given as a citation for some regulatory aspects of the Water Boards' operations. In the References section, on Page 14-3, Line 22, the full citation refers to a CEQA guidelines website. More relevant sources of information on Water Board regulations and permitting activities can be found at  
[http://www.waterboards.ca.gov/laws\\_regulations/docs/portercologne.pdf](http://www.waterboards.ca.gov/laws_regulations/docs/portercologne.pdf) and  
<http://cfpub.epa.gov/npdes/statestats.cfm>.

Line 28 on Page 5-39 includes the citation "California Regional Water Quality Control Board, 2004" which does not exist in the References section.

In conclusion, the Regional Board's participation in the development of this study was a very valuable experience and the opportunity given for that involvement is greatly appreciated. Restoration of water quality and the many beneficial uses of the Los Angeles River and its tributaries is a high priority of the Board and we look forward to continued collaboration in this vein. Should you have any questions concerning this letter, please contact Shirley Birosik at (213) 576-6679 or [Shirley.Birosik@waterboards.ca.gov](mailto:Shirley.Birosik@waterboards.ca.gov).

Sincerely,



Deborah J. Smith  
Chief Deputy Executive Officer

cc: John Kemmerer, USEPA Region IX,  
Los Angeles Field Office





# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SCAQMD

SENT VIA USPS AND E-MAIL:  
[Erin.L.Jones@usace.army.mil](mailto:Erin.L.Jones@usace.army.mil)

November 18, 2013

Ms. Erin Jones, CESPL-PD-RN  
Project Environmental Coordinator  
U.S. Army Corps of Engineers  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Draft Environmental Impact Statement/Environmental Impact Report**  
**(Draft EIS/EIR) for the Proposed Los Angeles River Ecosystem Restoration**  
**Integrated Feasibility Report**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final NEPA/CEQA document.

In the project description, the lead agency proposes to restore approximately 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles and to provide recreational opportunities consistent with the restored ecosystem within the 11-mile reach of the river. Construction would begin in July 2016 and end in early 2017.

The lead agency has analyzed four of the 19 original alternatives in the draft NEPA/CEQA document selecting Alternative 13, Arbor Corridor Extension (ACE), as the lead agency's Tentatively Selected Plan. This alternative would restore the river areas by reestablishing the river banks bordering the river along the 11-mile river reach and the freshwater marsh and habitat communities that live on, in or near the project water areas. In addition, the proposed project would reconnect the river to major water sources that join the river and the river's historic flood plain, while still managing for flood control. The proposed project would also connect the river area's habitat zones and provide recreational opportunities within the restored project area. Between the four alternatives, the lead agency estimates that as many as 477 daily truck trips could occur for activities that include excavation, soil movement and debris removal but 338 daily truck trips are specifically projected to be used during Alternative 13. In its analyses, the lead agency has determined that Alternative 13 as well as the other three alternatives substantially exceed the recommended daily regional and localized significance thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub> and ROG emissions. The SCAQMD staff therefore recommends that the lead agency consider additional feasible mitigation measures and incorporate them into the Final EIS/EIR if they are found to be feasible. Details regarding these and other comments are included in the attachment.

Ms. Erin Jones,  
Project Environmental Coordinator

November 18, 2013

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC130919-06  
Control Number

**Air Quality Analysis**

1. In the air quality analysis in Appendix F (Table 2.2 Construction Data under Equipment Mix for All Alternatives), the lead agency lists the equipment mixture for all alternatives estimating 11 pieces of equipment per day but the number and types of equipment do not agree with the amounts entered in the CalEEMod modeling inputs for Alternative 13 that shows six pieces of off-road equipment. This discrepancy should be clarified and/or revised in the final NEPA/CEQA document and applicable analyses.

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**Large Operation Notification**

2. On page five in Appendix F, the lead agency describes each alternative as a large-scale development project with each size exceeding 500 acres. Should the proposed project fall under the requirements of Rule 403 – Fugitive Dust for large operations according to SCAQMD Rule 403(c)(18), then the lead agency should submit SCAQMD Form 403N (Large Operation Notification Form) to the SCAQMD. Questions concerning Form 403N can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2372.

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**Mitigation Measures – Construction**

3. Since the lead agency has determined in the Draft EIS/EIR air quality analysis that construction air quality impacts exceed the recognized air quality significance levels for CO, NOx, PM10, PM2.5, and ROG, the SCAQMD staff recommends the following additional mitigation measures in the Final EIS/EIR pursuant to CEQA Guidelines Section 15126.4 to reduce the project’s significant air quality impacts in addition to the Best Management Practices and Impact Avoidance Measures included in the draft document listed on page 19 in Appendix F. The following measures have been determined to be feasible and applicable to past projects within other jurisdictions.<sup>1</sup>
  - Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements.

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<sup>1</sup> For example see the Metro Green Construction Policy at:  
[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

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#### Recommended Additions:

##### Combustion Emissions from Construction Equipment

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on-and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>.

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##### Fugitive Dust

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour
- Require frequent street sweeping surrounding the project site to minimize fugitive dust emissions from track-out. All street sweeping shall use alternatively fueled sweepers that are equivalent to those specified in SCAQMD Rules 1186 and 1186.1.
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces.
- Replace ground cover in disturbed areas as quickly as possible.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).

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For additional measures to reduce off-road construction equipment emissions, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

**NEPA Thresholds and General Conformity**

The Draft EIR/EIS includes NEPA thresholds of 50 tons/year for CO, NOx, ROG, SO2, PM10, and PM2.5 to determine significance. SCAQMD staff notes that these thresholds are not equivalent to the General Conformity thresholds.<sup>2</sup> For example, due to our extreme nonattainment status for ozone, the General Conformity threshold is only 10 tons/year for NOx. The lead agency should contact SCAQMD staff at (909) 396-3056 to discuss how General Conformity for this project. In addition, the Final EIR/EIS should discuss General Conformity for all pollutants and how the NEPA thresholds correspond to General Conformity thresholds.

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**Alternative Disposal Methods**

A significant fraction of the project’s NOx emissions come from hauling soil away from the site using trucks. With the existing rail lines in the area, the project may be able to utilize this resource to replace truck trips. As an example, a recent project being conducted at Taylor Yard by the California Department of Toxic Substances Control<sup>3</sup> is hauling contaminated soils away using a local rail line, thus substantially reducing the number of truck trips. The Final EIR/EIS should evaluate this measure and implement it if found feasible to reduce air quality impacts.

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<sup>2</sup> Available here: <http://www.epa.gov/air/genconform/deminimis.html>

<sup>3</sup> [http://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=19470006](http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19470006)



COUNTY OF LOS ANGELES

DEPARTMENT OF PARKS AND RECREATION

*"Parks Make Life Better!"*

Russ Guiney, Director

John Wicker, Chief Deputy Director

County of LA Parks & Rec

November 18, 2013

Sent via email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil).

Josephine R. Axt, Ph.D  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones  
CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

**NOTICE OF AVAILABILITY OF A DRAFT FEASIBILITY STUDY AND ENVIRONMENTAL  
IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR  
THE LOS ANGELES RIVER ECOSYSTEM RESTORATION STUDY**

The Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Study has been reviewed for potential impacts on County facilities operated by this Department and we offer the following comments:

A "proposed" County trail, the LA River Trail Extension, is located on the eastern bank of the Los Angeles River beginning at Fletcher Avenue in the north (within the northern limit of the restoration project) and extending south past the downtown area. Please consult with the Department's Trails Section to ensure that a coordinated trails effort takes place.

Thank you for including this Department in the environmental review process. To obtain electronic County trails data, please contact Jeremy Bok in the Trails Section at (213) 351-5137 or [jbok@lacounty.gov](mailto:jbok@lacounty.gov).

Sincerely,

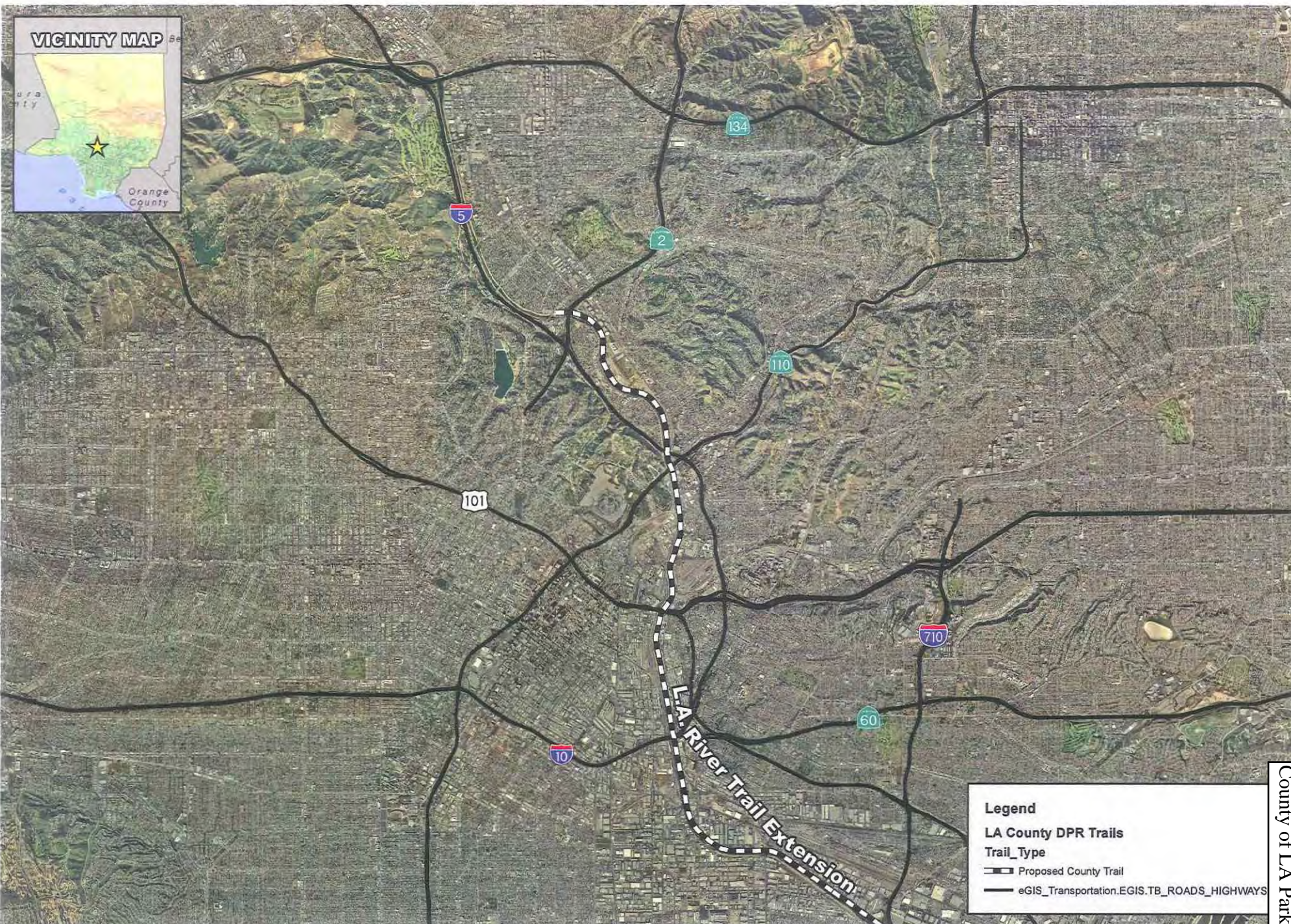
Kathline J. King, Chief  
Planning Division

KK: JAR: JIC/ Response to Los Angeles River Ecosystem Restoration

Enclosure: Proposed County Trail, Los Angeles River Extension

c: Parks and Recreation (N. E. Garcia, J. Rupert, F. Moreno, J. Bok, F. Yee, J. Chien)









GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

LA DPW

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE:

WMD-5

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
P.O. Box 532711  
Los Angeles, CA 90053

Attention Ms. Erin Jones

Dear Dr. Axt:

### **U.S. ARMY CORPS OF ENGINEERS COMMENTS FOR THE LOS ANGELES RIVER ECOSYSTEM RESTORATION INTEGRATED FEASIBILITY REPORT**

The County of Los Angeles Department of Public Works and Los Angeles County Flood Control District support efforts to improve, restore, and create ecosystems within our watersheds. The Ecosystem Restoration Study (Study) identifies opportunities for open space and parks, which will improve aesthetics of the Los Angeles River (River), provide an environment for passive recreation, and enhance environmental resources along the River consistent with parts of the Los Angeles River Master Plan.

The Study identifies communities within the project limits currently at risk of flooding due to a storm of 100-year frequency. The Study states that a Letter of Map Revision will be filed with the Federal Emergency Management Agency and that the risk will be communicated to the impacted communities. The Los Angeles County Flood Control District supports all efforts to reduce flood risk including education. It is recommended that the U.S. Army Corps of Engineers together with the Cities of Burbank, Glendale, and Los Angeles inform the impacted communities of the associated risk.



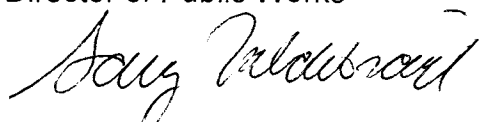
Josephine R. Axt, Ph.D.  
November 18, 2013  
Page 2

Also, we did not see any information in the Study on impacts to the interior drainage system resulting from any increased water surface elevations. We recommend this information be included in the final report. 2

If you have any questions or need additional information, please contact me at (626) 458-4300 or ghildeb@dpw.lacounty.gov or your staff may contact Ms. Terri Grant at (626) 458-4309 or tgrant@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER  
Director of Public Works



GARY HILDEBRAND  
Assistant Deputy Director  
Watershed Management Division

KK:sw

P:\wmpub\Secretarial\2013 Documents\Letter\feasibilityreport.doc\13397



## Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

November 18, 2013

Josephine R. Axt, Ph.D., Chief  
Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt and Ms. Jones:

### **DRAFT INTEGRATED FEASIBILITY REPORT FOR THE LOS ANGELES RIVER ECOSYSTEM RESTORATION STUDY COMMENT LETTER**

The Department of Regional Planning (DRP) has reviewed the Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Study (LA River Study) and provides the following comments.

The LA River Study evaluates alternatives for the purpose of restoring 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles, while maintaining existing levels of flood risk management. The DRP is currently in the process of updating Los Angeles County's Significant Ecological Area (SEA) Program, established by the Board of Supervisors in 1980, which applies additional zoning regulations to development in areas containing high quality biological resources that represent the cumulative biodiversity of Los Angeles County. This update includes a substantial expansion of the currently adopted SEA boundaries in order to promote regional habitat linkages and wildlife connectivity.

In light of the aims of the SEA Program, the DRP would like to provide our support for Alternative 20, the most expansive of the LA River Study alternatives. In the words of the study, "this alternative restores the confluence with Verdugo Wash by softening the bed of the stream and significantly widening the mouth of the wash thus providing riparian habitat and an additional connection to the San Gabriels through the

Dr. Josephine R. Axt  
Ms. Erin Jones  
November 18, 2013  
Page 2

Verdugo Hills.”<sup>1</sup> It would also add a freshwater marsh at the downtown Los Angeles Cornfields site.<sup>2</sup> Alternative 20 also incorporates Arroyo Seco plan features from Alternative 13, including the softening of the concrete banks and bed for half a mile along the Arroyo, and the creation of a backwater wetland with more riverbank vegetation at the confluence with the LA River. This connectivity restoration would have immense significance in increasing wildlife linkages and movement between the Griffith Park SEA, the Verdugo Mountains SEA and the proposed Altadena Foothills and Arroyos SEA, by restoring a total of 719 acres of habitat along the 11 mile study reach<sup>3</sup> and would revitalize regional wildlife linkages through one of the County’s most urbanized areas, as shown in your study’s Figure 6-12, “Alternative 20 Potential Regional Habitat Connectivity with Increase from 16 Shown by the Polygons”.<sup>4</sup>

The proposed Altadena Foothills and Arroyos SEA includes important watershed areas that drain from the Altadena Foothills to the stream headlands that flow into the Arroyo Seco. Improvements to the Arroyo’s confluence with the LA River will increase the potential upstream connectivity and allow for greater retention and filtration of natural groundwater generated in the proposed SEA. Although the County does not have land use jurisdiction over either the Griffith Park SEA or the Verdugo Mountains SEA, as they are both located within incorporated cities, the connectivity that the restoration proposed in Alternative 20 would create between the three SEAs is extremely important for improving the greater regional linkages between the Santa Monica Mountains SEA to the southwest and the Angeles National Forest to the north. Taken in conjunction with the potential expansion of the Santa Monica Mountains National Recreation Area under consideration in the National Park Service’s Rim of the Valley Study, these national efforts represent a significant local opportunity to increase the connection between urban parks and large natural habitat areas surrounding the San Fernando Valley, creating the opportunity for many of the County’s urban residents and wildlife to regain greater connections to the larger natural areas located in the Santa Monica Mountains and the Angeles National Forest.

Although the comments of our Department specifically address how Alternative 20 would best align with the objectives of our SEA Program; the larger picture is that the restoration of the Los Angeles River will enhance Los Angeles County in many ways. Alternative 20 has been supported by our Board of Supervisors, the Mayor of the City of

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<sup>1</sup>Executive Summary, Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report , 2013, pg xxvii

<sup>2</sup> Executive Summary, pg xxix

<sup>3</sup> Chapter 6, Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report, 2013, pg 6-23

<sup>4</sup> Chapter 6, pg 6-26

Dr. Josephine R. Axt  
Ms. Erin Jones  
November 18, 2013  
Page 3

Los Angeles, and numerous local organizations and citizens, who all look forward to the economic, environmental and recreational benefits of a restored Los Angeles River.

If you have additional questions or would like to discuss this matter further, please contact Emma Howard at [ehoward@planning.lacounty.gov](mailto:ehoward@planning.lacounty.gov) or (213) 974-6476 between 7:30 a.m. and 5:30 p.m., Monday through Thursday.

Sincerely,



Richard J. Bruckner  
Director

RJB:MC  
MWG:eh

c: Los Angeles River Revitalization Corporation (Omar Brownson),  
Bureau of Engineering, Los Angeles River Project Office (Carol Armstrong)

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LaBonge

## CITY COUNCIL OF THE CITY OF LOS ANGELES

**TOM LABONGE**  
COUNCILMEMBER 4TH DISTRICT

ROOM 480, CITY HALL  
LOS ANGELES, CA 90012  
(213) 485-3337  
FAX (213) 624-7810

October 9, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District;  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, California 90053-2325

Dear Ms. Axt,

After working with activists for decades to raise awareness for the revitalization of the Los Angeles River, I am gratified that the U.S. Army Corps of Engineers is supporting the restoration of the river's natural habitat. I have been an ardent supporter of the City's River Revitalization Master Plan and all-things River. The beautiful Los Angeles River is adjacent to Griffith Park.

I am writing today to urge your selection of Alternative 20 of the Draft Integrated Feasibility Report of the Los Angeles River Ecosystem Restoration Feasibility Study.

My district includes the Glendale Narrows, which is within the ARBOR area, the focus of the feasibility study. Over the past ten years, I have happily watched as blue herons and other bird species, as well as fish and people, have return to this beautiful stretch of the Los Angeles River where I played as a child. The Glendale Narrows gives us a glimpse of the potential for the river as a natural, park-lined waterway where Angelenos from all of Los Angeles can come together to ride horses, fish and ride bikes along the river.

This vision for the river's future inspired me to urge that Alternative 20, the most comprehensive plan outlined in the study, be chosen as the preferred alternative of the report. This alternative provides for the greatest bang for the buck as well as several other significant improvements within my district: widening the soft-bottomed riverbed near Riverside Avenue and Victory Boulevard as well as the restoration of the Verdugo Wash confluence, a critical ecosystem area.

The City of Los Angeles has been eager for decades to work with the Army Corps to restore natural elements of the river while continuing to provide flood control and ensure public safety. We are at a critical moment with tremendous potential for influencing the future growth of Los Angeles. Please continue working with us by selecting Alternative 20 as the preferred plan for the restoration of our river. Thank you.

Sincerely,

TOM LABONGE  
Councilmember, 4<sup>th</sup> District





Arts, Parks, Health, Aging and  
Los Angeles River  
Chair

Personnel and Animal  
Welfare  
Vice-Chair

MITCH O'FARRELL  
Councilmember  
Thirteenth Council District

Education and Neighborhoods  
Member

Innovation, Technology and  
General Services  
Member

Public Safety  
Member

November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt,

I have the great privilege to represent many of the communities surrounding the Los Angeles River while also serving as the chair of the Los Angeles City Council's Arts, Parks, Health, Aging and River Committee and I am writing to express my strong support of Alternative 20 contained in the Los Angeles River Ecosystem Feasibility Study, also known as the Alternative with Restoration Benefits and Opportunities for Revitalization (ARBOR) study. I have been closely involved in the development of the Los Angeles River Ecosystem Feasibility Study and know that it reflects years of work and aspiration--from the Army Corps of Engineers (ACE), the City, and countless Angelenos.

The primary goal of the ARBOR study is to restore 11 miles of the LA River from Griffith Park to Downtown by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the river to major tributaries while maintaining existing levels of flood risk management. This project will be one of the largest examples of urban ecosystem restoration, in the nation's second most populous city. I stand with the Friends of the Los Angeles River, the Los Angeles River Revitalization Corporation and the National Resources Defense Council and encourage ACE to ultimately recognize the long term benefits of selecting Alternative 20 as an investment in the future of the LA River. The City's partnership with ACE in this endeavor reflects our confidence in your ability to deliver on this unprecedented opportunity to rectify the environmental damage resulting from the river's channelization.

Connectivity is a key element of the study and Alternative 20 is the only option that connects the LA River to Piggyback Yard. Additionally, the restoration of the Verdugo Wash and the Los Angeles Historic Park, two key river adjacent properties, are critical pieces to connecting the river to the surrounding communities, mountains and streams. Alternative 20 restores the most acreage, resulting in the largest increase in habitat, vegetation and expanse of a naturalized River bottom. This effort will benefit the entire River system.

The remaking of the LA River represents a threshold moment for the City of Los Angeles. The City of Los Angeles is deeply committed to partnering with ACE and will lead the efforts for land assemblage and remediation. The City has already taken bold actions to ensure that the LA River

is protected through the development of Los Angeles River Revitalization Master Plan and the Los Angeles River Improvement Overlay District. The City has consistently demonstrated a commitment to the revitalization of the entire LA River system.

I will continue to be a leader for the revitalization of the entire LA River system including its tributaries and surrounding lands. The works that has been completed thus far such as the development of multiple parks, the LA River bicycle path and design of two new pedestrian bridges are bringing benefits to the City of Los Angeles. The benefits are directly felt in communities that are lacking green space and live with high levels of pollution caused by freeway adjacency and industrial uses.

In Los Angeles we have thousands of young people growing up in neighborhoods that do not have safe, easily-accessible places to play, exercise, or rest outside. Natural open spaces are the lungs of cities--important for people and wildlife simultaneously. Recreation spaces facilitate better physical and mental health and social cohesion. We are a vast City of immigrants with an incredibly diverse population that makes us stronger every day. Our size makes regional policy-making challenging, but not in the case of the LA River. Never before has our region come together in expressing unified support for such a sweeping transformation of our natural landscape. The restoration of the LA River is an opportunity to bridge communities and create a sustainable Los Angeles.

In conclusion, Alternative 13 does not go far enough in providing the building blocks for biodiversity that are necessary to reconnect our River with its historic floodplain. Alternative 16 goes further in legitimately connecting the Piggyback Yard to the River, but it misses opportunities by ignoring the chance to restore the River's confluence with the Verdugo Wash and the only large-scale western connection between the LA State Historic Park and the River. Only Alternative 20 would accommodate these important connections to existing significant ecological areas in the Verdugo and Elysian Hills.

A major goal of the study was to create important connectivity and the most complete biodiversity across an 11 mile stretch of the LA River, and while Alternative 13 marks significant progress for the LA River, it does not go as far as Alternative 20. I appreciate your consideration and know that Alternative 20 is the most beneficial option for the Army Corps of Engineers and the City of Los Angeles, since it can deliver the largest increase in habitat with more restored acres than any other alternative.

With kind regards,



**MITCH O'FARRELL**  
Councilmember, District 13  
City of Los Angeles  
Los Angeles City Council

CC: Mayor Eric Garcetti  
Members of the Los Angeles City Council



## Bicycle Advisory Committee of the City of Los Angeles

October 8, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

**Re: Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Environmental Impact Study, and Environmental Impact Report:  
Support for Alternative 20**

Dear Dr. Axt:

The Bicycle Advisory Committee of the City of Los Angeles ("BAC") was established to serve in an advisory capacity "in the encouragement and facilitation of the use of the bicycle as regular means of transportation and recreation." Our membership consists of four members appointed by the Mayor of Los Angeles, and one member representing each of the City's fifteen council districts.

On October 1, 2013, the BAC voted unanimously to add its voice in support of the attached Resolution adopted by the Los Angeles City Council and approved by Mayor Garcetti, which urges the Corps of Engineers to adopt the most expansive Los Angeles River ecosystem restoration, or Alternative 20.

Very truly yours,

A handwritten signature in blue ink, which appears to read "Jeff Jacobberger".

Jeff Jacobberger  
Chair, Bicycle Advisory Committee

cc: Nat Gale, Office of the Mayor  
Michelle Mowery, Senior Bicycle Coordinator



CITY OF LOS ANGELES  
CALIFORNIA

HOLLY L. WOLCOTT  
Interim City Clerk



ERIC GARCETTI  
MAYOR

Office of the  
CITY CLERK

Council and Public Services  
Room 395, City Hall  
Los Angeles, CA 90012  
General Information - (213) 978-1133  
Fax: (213) 978-1040

SHANNON HOPPE  
Council and Public Services  
Division

[www.cityclerk.lacity.org](http://www.cityclerk.lacity.org)

When making inquiries relative to  
this matter, please refer to the  
Council File No.

September 6, 2013

To All Interested Parties:

The City Council adopted the action(s), as attached, under Council File No. 10-0270-S3, at its meeting held August 23, 2013.

City Clerk  
io

OFFICE Mayor's Time Stamp  
 RECEIVED  
 2013 AUG 27 PM 1:14  
 CITY OF LOS ANGELES

RECEIVED  
 City Clerk's Time Stamp  
 CITY CLERK'S OFFICE  
 2013 AUG 27 PM 1:12  
 CITY CLERK  
 BY \_\_\_\_\_  
 DEPUTY

SUBJECT TO THE CONCURRENCE OF THE MAYOR

COUNCIL FILE NO. 10-0270-S3

COUNCIL DISTRICT \_\_\_\_\_

COUNCIL APPROVAL DATE AUGUST 23, 2013

RE: A LOS ANGELES RIVER ECOSYSTEM RESTORATION FEASIBILITY STUDY ALTERNATIVE THAT RESULTS IN THE MOST EXPANSIVE ECOSYSTEM RESTORATION

LAST DAY FOR MAYOR TO ACT SEP 06 2013  
 [10 Day Charter requirement as per Charter Section 231(h)]

DO NOT WRITE BELOW THIS LINE - FOR MAYOR USE ONLY

APPROVED

\*DISAPPROVED

\*Transmit objections in writing  
 pursuant to Charter Section 231 (h)

DATE OF MAYOR APPROVAL OR DISAPPROVAL 9/04/13

E.G.  
 MAYOR

BY \_\_\_\_\_  
 CITY CLERK  
 DEPUTY

2013 SEP - 4 PM 1:50

CITY CLERK'S OFFICE

## RESOLUTION

11 > WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, In 2006, recognizing the environmental degradation occurring in and along the Los Angeles River within the City's boundaries, the City Council authorized the Board of Public Works to execute an agreement with the US Army Corps of Engineers (Corps) for the *Los Angeles River Ecosystem Restoration Feasibility Study* also known as the ARBOR Study (Study), committing the City to a fifty (50) percent share of the cost as local sponsor (C.F. 06-0496), which was increased in 2009 as the total Study cost was raised to nine million seven hundred ten thousand dollars (\$9,710,000) (C.F. 07-1342-S8); and

WHEREAS, In 2010, the County of Los Angeles contributed one hundred thirty thousand dollars (\$130,000) to the Study because of the Study's role in furthering its Los Angeles River restoration goals (C.F. 07-1342-S8); and

WHEREAS, In 2012, Friends of the Los Angeles River (FoLAR), the longest-standing advocacy group supporting restoration of the river, committed nine hundred seventy thousand dollars (\$970,000) to the Study for its completion (C.F. 10-0270-S2); and

WHEREAS, The Study is consistent with the goals of President Obama's America's Great Outdoors initiative, which includes direction to "Reconnect Americans, especially children, to America's rivers and waterways..." and to "Build upon State, local, private, and tribal priorities for the conservation of land, water, wildlife, historic, and cultural resources, creating corridors and connectivity across these outdoor spaces, and for enhancing neighborhood parks..." asking federal agencies to "...determine how the Federal Government can best advance those priorities through public private partnerships and locally supported conservation strategies"; and

WHEREAS, The Los Angeles River watershed was selected as one of only seven nationwide first-phase pilots of the Urban Waters Federal Partnership, an implementation piece of the America's Great Outdoors initiative, which aims to "stimulate regional and local economies, create local jobs, improve quality of life, and protect Americans' health by revitalizing urban waterways in under-served communities across the country" and the Study was selected as the top priority of the Urban Waters Federal Partnership in Los Angeles; and

WHEREAS, In 2013, the Corps has developed a final array of four "best buy" alternatives for the Study and only one of those alternatives includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection—providing a profound hydrological link between the Los Angeles State Historic Park (Cornfields site) and the river, leveraging a significant investment made by the State of California toward river restoration; and

WHEREAS, The City's Los Angeles River Revitalization Master Plan identified these two "opportunity areas" as critical opportunities for restoration (C.F. 07-1342);

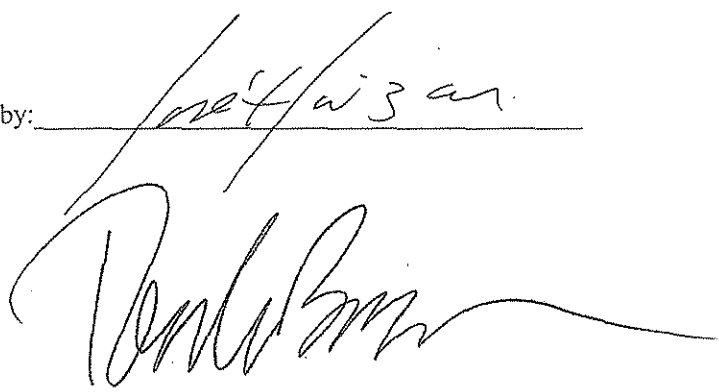


NOW, THEREFORE BE, IT RESOLVED, that the Council, with the concurrence of the Mayor, by the adoption of this Resolution, endorses a Study alternative that results in the most expansive ecosystem restoration, specifically that in which includes the following priorities for the City of Los Angeles:

- Verdugo Wash Confluence
- Taylor Yard/Bowtie
- Taylor Yard/G-2
- Arroyo Seco Confluence
- Cornfields LA State Historic Park
- Piggyback Yard (Union Pacific Railroad)

Presented By:   
MITCH O'FARRELL, COUNCILMEMBER 13<sup>th</sup> District

  
GIL CEDILLO, COUNCILMEMBER 1<sup>st</sup> District

Seconded by: 

AUG 14 2013 continued in Aug 23, 2013

**ADOPTED**

AUG 23 2013

LOS ANGELES CITY COUNCIL

ORIGINAL

MAYOR WITH FILE



BOARD OF PUBLIC WORKS  
MEMBERS—  
KEVIN JAMES  
PRESIDENTMONICA RODRIGUEZ  
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COMMISSIONERCITY OF LOS ANGELES  
CALIFORNIAERIC GARCETTI  
MAYOR

## BUREAU OF SANITATION

—  
ENRIQUE C. ZALDIVAR  
DIRECTORTRACI J. MINAMIDE  
CHIEF OPERATING OFFICERVAROUJ S. ABKIAN  
ADEL H. HAGEKHALIL  
ALEXANDER E. HELOU  
ASSISTANT DIRECTORSNEIL M. GUGLIELMO  
CHIEF FINANCIAL OFFICER—  
1149 SOUTH BROADWAY, 10<sup>TH</sup> FLOOR  
LOS ANGELES, CA 90015  
TEL: (213) 485-0587  
FAX: (213) 485-3939  
WWW.LACITYSAN.ORG

November 15, 2013

Josephine R. Axt, Ph.D., Chief Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

**RESPONSE TO USACOE SPL-2013-003-NLH-DRAFT IFR FOR LA RIVER  
ECOSYSTEM RESTORATION FEASIBILITY STUDY**

Los Angeles Sanitation (LA Sanitation) appreciates the opportunity to comment on the U.S. Army Corps' *Los Angeles River Ecosystem Restoration Feasibility Study's "Integrated Feasibility Report"* (Report).

LA Sanitation has worked closely with other key City departments to support the efforts to revitalize the Los Angeles River. Through these efforts, the City of Los Angeles has led a collaborative process to inform the public on the planning, and decision-making related to LA River's habitat and economic revitalization.

We commend the US Army Corps of Engineers for its extensive assessment of the alternatives for LA River in the Report. **In particular, LA Sanitation expresses its support to Alternative 20 as it represents a consistent direction for the City of Los Angeles.**

LA Sanitation in collaboration with other City departments has implemented projects like South LA Wetlands and Echo Park Lake projects as part its Proposition O program for improving the water quality in LA River and other waters in our City. These projects have transformed the surrounding communities by providing them open space, recreation, education, habitat, etc, that they would otherwise have been deprived of. LA Sanitation believes that through integration, innovation, collaboration, and coordination, Alternative 20 provides a unique opportunity for eco-system restoration and implementation of many more projects such as South LA Wetlands and Echo Park Lake throughout the City and the region. LA Sanitation also believes that water quality improvement is an integral part of LA River revitalization that can be achieved through integration with habitat and eco-system restoration.



Response to USACOE SPL-2013-003-NLH-Draft IFR for LA River Ecosystem Restoration Feasibility Study  
November 15, 2013  
Page 2 of 2

Recycled water is an essential resource for both the LA River and for the City's water supply. As indicated in the Combined Habitat Assessment Protocol (Appendix G of the Report), recycled water composes the majority of water in the LA River during the dry weather months. We continue to face reductions in the reliability of our imported water supplies and recycled water serves as a vital component of the City's plans to ensure a sustainable local water supply.

Establishing storm water capture as a priority for ecosystem restoration will lead to greater cost effectiveness, and a more sustainable ecosystem restoration.

LA Sanitation commends the work and partnership of the US Army Corps of Engineers on the LA River. We look forward to collaborating closely with your organization in the development of specific projects as part of the selected Alternative to ensure that this critical balance is achieved.

Should you have any questions, please contact Ali Poosti at (323) 342-6228 or Shahram Kharaghani at (213) 485-0587.

Sincerely,



ENRIQUE C. ZALDIVAR, Director  
Bureau of Sanitation

SK:sk  
WPDCR9077

cc: Ron Nichols, LA DWP – General Manager  
Traci Minamide, LA Sanitation – Chief Operating Officer  
Adel Hagekhalil, LA Sanitation – Assistant Director  
Ali Poosti, LA Sanitation Wastewater Engineering Services  
Shahram Kharaghani, LA Sanitation Watershed Protection  
Hiddo Netto, LA Sanitation Water Reclamation  
Omar Moghaddam, LA Sanitation Regulatory Affairs  
Doug Walters, LA Sanitation Wastewater Engineering Services  
Deborah Deets, Landscape Architect, LA Sanitation Watershed Protection  
Carol Armstrong, Bureau of Engineering, River Project Office  
Wing Tam, LA Sanitation Watershed Protection

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401  
CITY PLANNING COMMISSION  
RENEE DAKE WILSON  
PRESIDENT  
DANA M. PERLMAN  
VICE-PRESIDENT  
ROBERT L. AHN  
DAVID H. J. AMBROZ  
MARIA CABILDO  
CAROLINE CHOE  
RICHARD KATZ  
JOHN W. MACK  
MARTA SEGURA  
JAMES K. WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCETTI  
MAYOR

EX-110 LA City Planning

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ALAN BELL, AICP  
DEPUTY DIRECTOR  
(213) 978-1272  
LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274  
EVA YUAN-MCDANIEL  
DEPUTY DIRECTOR  
(213) 978-1273  
FAX: (213) 978-1275

INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Nox 532711  
Attn L Ms. Erin Jones, CESPL-PD-RN  
Los Angeles California 90053-2325

November 15, 2013

Dear Ms. Axt:

The City of Los Angeles Department of City Planning urges the United States Army Corps of Engineers to select ARBOR study Alternative 20, which would serve to revitalize communities and create a more functional and interconnected watershed that will provide a diverse regional ecological system and restore the functionality of the Los Angeles River as a critical natural, cultural and community resource.

The Los Angeles River careens past some of the City's most fascinating ecological, historical and recreational terrain, presenting City residents a wonderful opportunity to connect the principles of healthy living with the goals of producing sustainable and liveable communities. It is a valuable resource that threads through Los Angeles' most diverse and underrepresented communities, crossing boundaries of race, class, and human and physical geography. Providing an intricate and unique landscape for civic engagement, the Los Angeles River offers Angelenos an outdoor place for respite, education, and recreation with family and friends. The River also offers communities and business owners a powerful tool for implementing strategic economic investment that will promote job growth and improve the City's economic climate. Celebrating the values of the River not only ensures a healthier population but also engages members of the public to think about conservation and the importance of outdoor recreational opportunities.

Your selection of Alternative 13 proves your commitment to the Los Angeles River and your understanding of its value as an integral ecological resource for the City of Los Angeles. However, Alternative 13 falls short in meeting the demands of ecosystem restoration and economic development as it does not include two key points of contact between the Los Angeles River and the Verdugo and Arroyo Seco tributaries. Thus, the City Planning Department would respectfully request your further commitment to Alternative 20 as we believe the value of adding the restoration of the Verdugo Wash and the wetlands of the Los Angeles State Historic Park is critical to the restoration efforts of the River, its tributaries and the growth of the City of Los Angeles.



The City of Los Angeles is currently working on a Vision Plan and Economic Development Strategy for the Northeast Los Angeles Riverfront District. The boundaries of this District contain the Verdugo Wash at the northernmost point and the Los Angeles State Historic Park at the southernmost point. This Vision document aims to celebrate the existing Northeast Los Angeles River landscape by creating a continuous, linear, recreational experience, connecting some of Los Angeles' most interesting ecological assets to the communities that surround them in an effort to develop a sense of place and identity. The purpose of the Vision document is to provide a shared community-wide vision framework that informs elected officials along with various City, State and Federal agencies of future economic and recreational investment priorities. The framework largely addresses issues related to physical design and urban form while considering social, environmental, and economic factors. This Vision document also recommends action steps and lays a preliminary implementation timeline for recommended catalytic and prototypical development projects intended to advance the shared community wide vision. The restoration of the Verdugo Wash and Los Angeles State Historic Park would substantially further the City's goal at creating a linear and continuous recreational experience within this portion of the River.

The northern boundary of the Vision and Economic Development study area is the Verdugo Wash. The Verdugo Wash, a 9.4 mile tributary of the Los Angeles River, drains the hills just north of Burbank and Glendale. The intersection of the 5 and the 134 Freeways marks the convergence of the Verdugo and the Los Angeles River. The restoration of the Verdugo wash tributary provides a future connection between the LA River to the Verdugo Mountains, thereby supporting a connection that historically supports a habitat corridor for movement of wildlife. This restoration would also create a linear connection between the City of Los Angeles' efforts within Northeast Los Angeles to the continuing efforts of the City of Glendale and their "Riverwalk" project. This connection is only available within Alternative 20.

The southern boundary of the Vision and Economic Development study area is the Los Angeles State Historic Park. The City and State have invested time and resources in creating a beautiful recreational space within the Chinatown area, with close proximity to the Metro Gold Line, Union Station and Downtown. While this site is adjacent to the Los Angeles River, it does not connect. Connecting the Los Angeles River to the Los Angeles State Historic Park not only provides a critical ecological connection to a highly alluvial point of contact between the Los Angeles River and potentially the Arroyo Seco River, but also will provide critical open space and greenway pedestrian/bicycle connections from Glendale and Northeast Los Angeles to the State Historic Park, and thereby connections to the Metro Gold Line, Union Station and Downtown. This provides an immeasurable social and economic opportunity for City residents that would only be realized within Alternative 20.

In addition to the Northeast Los Angeles Vision and Economic Development Plan, the Department created a River Implementation Overlay District (RIO) which is a special use district that requires developers to design projects which are ecologically compatible to and sensitive of the Los Angeles River and its watershed. The RIO Ordinance is expected to receive Council approval in late 2013 or early 2014. The City has also prioritized open space connections to the River within the City's Bicycle Plan, thereby creating a network of green, non-vehicular, multi-modal transportation



opportunities along the River. The Plan is expected to receive approval in early 2014. The value of having a linear ecological interface that connects different communities within the City via the Los Angeles River is critical to our mobility goals. Alternative 20 reinforces our efforts at utilizing the River as not only a critical form of flood protection but as a means of non-vehicular transportation, economic development, passive and active recreation and connection between communities.

The City of Los Angeles has made substantial efforts and utilized a multi-disciplinary approach towards the revitalization of the Los Angeles River. From zoning to wildlife restoration to multi-modal transportation, the City has partnered with multiple agencies to ensure that every aspect of river revitalization is taken into consideration and approached in a holistic manner. Please consider the Department of City Planning's request for an increased commitment from Alternative 13 to Alternative 20 for its ecological value as well as its proposed social and economic value in promoting and creating healthy, sustainable, and well-connected communities surrounding the Los Angeles River. Should you have additional questions, please contact Christine Saponara via telephone at (213) 978-1363 or via email at [Christine.Saponara@lacity.org](mailto:Christine.Saponara@lacity.org).

Sincerely,



ALAN BELL, AICP  
Deputy Director of Planning

**BOARD OF RECREATION AND  
PARK COMMISSIONERS**

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Commission Executive Assistant II

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General Manager

**CITY OF LOS ANGELES**  
CALIFORNIA



**ERIC GARCETTI**  
MAYOR

DEPARTMENT OF  
RECREATION & PARKS  
**LA Rec & Parks**

221 N. FIGUEROA STREET, SUITE 100  
LOS ANGELES, CA 90012

(213) 202-2681  
FAX - (213) 202-2612

**MICHAEL A. SHULL**  
Assistant General Manager  
Planning, Construction and  
Maintenance Branch

Josephine R. Axt, Ph.D.  
Chief Planning Division  
U.S. Army Corps of Engineers  
Los Angeles, District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Attention: Ms. Erin Jones, CESPL-PD-RN

Dear Ms. Axt:

**LOS ANGELES RIVER ECOSYSTEM RESTORATION INTEGRATED FEASIBILITY  
REPORT**

The Department of Recreation and Parks has reviewed the Draft Integrated Feasibility Report (IRF) dated September 2013. The various alternatives discussed, including the Corps' Tentatively Selected Plan, Alternative 13, would physically impact various recreational sites within Griffith Park under the jurisdiction of the Department, particularly along Reaches 1 through 4 of the Los Angeles River.

The environmental restoration measures proposed, including habitat corridors and riparian plantings along the riverbanks, diversion of riverflows into side channels, and daylighting of storm drains, along with the development of recreational facilities within the restored areas, would affect the following recreational sites within Griffith Park:

- Pollywog Area
- Martinez Arena
- Los Angeles Equestrian Center
- Bette Davis Park
- Pecan Grove Picnic Area
- Ferraro Fields
- Wilson and Harding Golf Courses
- Los Feliz Golf Course

Consequently, once a restoration alternative is decided upon, it is critical to involve the Department as early as possible in the project design process to address any potential recreational and operational conflicts within Griffith Park from the environmental restoration approaches, desired construction staging areas, and other aspects of the project.

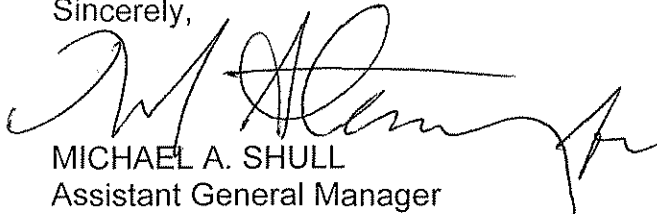


Josephine R. Axt, Ph.D.  
Chief Planning Division  
January 14, 2009  
Page 2

Finally, there are some edits required in the second paragraph of page 7-7: "Table 1" in the first line should be changed to "Table 7-2", and "Table 7-2" in the second line should be changed to "Table 7-3".

We appreciate the opportunity to comment on the IRF. Please contact Darryl Ford of my staff at (213) 202-2682 if you have any questions on this matter, as well as to facilitate coordination when the project design efforts get underway.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Shull", with a stylized flourish at the end.

MICHAEL A. SHULL  
Assistant General Manager

MAS/DA:es

cc: Darryl Ford, Management Analyst II, RAP. MS 682  
Reading File

# CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI  
MAYOR

JAN PERRY  
INTERIM GENERAL MANAGER

LA EWDD

ECONOMIC AND WORKFORCE  
DEVELOPMENT DEPARTMENT

1200 W. 7TH STREET  
LOS ANGELES, CA 90017

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Attn L Ms. Erin Jones, CESPL-PD-RN  
Los Angeles California 90053-2325  
E-mail: comments.lariverstudy@usace.army.mil

**SUBJECT: ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT  
SUPPORT LETTER FOR ARBOR STUDY ALTERNATIVE 20**

Dear Ms. Axt:

The City of Los Angeles Economic Workforce Development Department (City sponsoring agency of the Northeast Los Angeles Riverfront Collaborative project) urges the United States Army Corps of Engineers to select Alternative 20, which would best restore the natural ecosystem habitat of the river area that directly impacts the quality of life of the Northeast L.A. riverfront communities of Atwater Village, Cypress Park, Elysian Valley, Glassell Park, and Lincoln Heights. Furthermore, the expansive ecosystem restoration proposed in Alternative 20 provides the greatest value to a greater NELA region of over 330,000 residents that not only includes the riverfront communities but spans other L.A. neighborhoods and neighboring cities in the region such as Glendale, Burbank, and Pasadena.

We particularly would like the ARBOR study document to insert language about the investment that the Federal government and City of Los Angeles is making in the ARBOR Study Area that is directly situated in Northeast Los Angeles. The EWDD is home to a \$2.25 million dollar HUD-DOT-EPA Partnership for Sustainable Communities challenge planning grant called the Northeast Los Angeles Riverfront Collaborative. The goal is to build off the river revitalization efforts of the last 15 years and ensure that the adjacent riverfront neighborhoods co-benefit alongside the revitalization of the L.A. River. The collaborative is made up of a multidisciplinary partnership of federal and local government agencies, non-profits, universities, private firms, and public media all directed to collaborate and engage the local community toward the NELA RC policy goals. The current planning efforts include a city-sponsored NELA RC Vision Plan and Economic Development Implementation Strategy that is currently garnering input from the local community on how best to improve their neighborhoods and the river that they abut. Through numerous door-

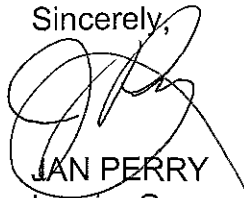


to-door resident and small business surveys and a series of community workshops with the NELA neighborhoods that are directly in the ARBOR study area, it has been concluded that many residents see the value of increased green space and natural habitat as an outcome that would motivate the local community to use the L.A. River more often. This further supports the need to approve Alternative 20 as this particular alternative presents the best case scenario for a riverfront ecosystem habitat that benefits the green space poor communities of NELA.

Additionally, Alternative 20 provides four times more jobs than the other proposed alternatives within the ARBOR study. As a department that focuses on workforce development, we recognize that more jobs have the potential of benefiting the local NELA population whose annual household income is lower than the average L.A. County household. We would work to ensure that the jobs being produced are quality living wage jobs and accessible to the local NELA population.

The commitment of the Army Corps of Engineers to take on the ARBOR study shows the dedication that the Corps and the Federal government has to Los Angeles's urban waterways and watershed. We hope that the most expansive option, Alternative 20, is adopted. Alternative 20 will provide the most sustainable pathway that will ensure environmental, social, economic, and cultural benefits to the Northeast L.A. Riverfront communities and the entire L.A. City and County region. Should you have additional questions about the EWDD and NELA RC work within the ARBOR Study area, please do not hesitate to contact EWDD Administrative Manager Gerardo Ruvalcaba at [Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org) or NELA RC Project Manager George Villanueva at [govillan@usc.edu](mailto:govillan@usc.edu) or (213) 509-1849.

Sincerely,



IAN PERRY  
Interim General Manager

JP:GR

ERIC GARCETTI  
Mayor

Commission  
MEL LEVINE, *President*  
WILLIAM W. FUNDERBURK JR., *Vice President*  
JILL BANKS BARAD  
MICHAEL F. FLEMING  
CHRISTINA E. NOONAN  
BARBARA E. MOSCHOS, *Secretary*

RONALD O. NICHOLS  
General Manager

November 18, 2013

Josephine R. Axt, Ph.D., Chief Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Attention: Ms. Erin Jones, CESPL-PD-RN, Los Angeles, CA 90053-2325

Dear Dr. Axt:

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the U.S. Army Corps' *Los Angeles River Ecosystem Restoration Feasibility Study's "Integrated Feasibility Report"* (Report). As the nation's largest municipally-owned utility, LADWP understands the challenges associated with developing large-scale public infrastructure projects. We serve a city of nearly four million people, and deliver water and power to our customers through extensive transmission and water infrastructure systems across the West and Southwest.

For more than a decade, LADWP has worked closely with key city departments to support the efforts to revitalize the Los Angeles River. Through these efforts, the City of Los Angeles and its city departments have led a comprehensive and collaborative public process to inform the planning, design, and decision-making related to the River's habitat and economic revitalization.

Today, we are at a critical juncture for the future of the LA River. We commend the US Army Corps' Report for its extensive assessment of the alternatives for the river. **And it is our view that Alternative 20 represents a consistent direction for the City of Los Angeles and is supported by LADWP.**

As the LA River's revitalization efforts continue, LADWP will play an active role. LADWP has significant interests along the river specifically related to recycled water and power transmission rights-of-way.

Recycled water is a valuable resource for both the LA River and for the City's water supply. As indicated in the Report's Combined Habitat Assessment Protocol (Appendix G), recycled water composes the majority of water in the LA River during the dry weather months. We continue to face reductions in the reliability of our imported water supplies,

Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013

111 N. Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles, CA 90051-5700  
Telephone: (213) 367-4211 www.LADWP.com

Josephine R. Axt, Ph.D  
Page 2  
November 18, 2013

and recycled water serves as a vital component of the City's plan to ensure a sustainable local water supply<sup>1</sup>.

In Appendix G of the Report, LADWP concurs with the water constraints identified by the Army Corps. There is a real potential for river flow modifications resulting from the strategies in the City's 2006 Water Integrated Resources Plan to 1) reduce dry weather flows, 2) implement stormwater capture projects, and 3) increase water recycling. We further agree with the Report's finding that the lack of a more significant, reliable water source for the study area could pose constraints on the ability to sustain functions of stream, riparian, and wetlands habitat, both existing and those proposed in the Report's alternatives.

Despite these anticipated water constraints, the Report's "Water Budget" (Table 8, Appendix E) shows the projected future summer flows for the alternatives as the historical dry-weather river flows. In the upper reaches of the Study area, these dry-weather flows are primarily recycled water from the City's Water Reclamation Plants. The Army Corps' projections will need to be reviewed and confirmed to verify the future summer flows that will be available on a sustained basis, consistent with other planned uses for the water. LADWP is prepared to work with the Army Corps so that we carefully balance our future plans for water supply, including increased recycled water use, with river restoration objectives.

In addition to recycled water, LADWP owns assets, both "in-fee" and through easements, along the LA River. The primary purpose of these assets is to deliver reliable water and power to the rate payers. These assets include the power transmission infrastructure located within the LA River corridor. The power transmission lines are an integral component to provide electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Council (NERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion and emergency operations.

As specific projects are developed under the Study's alternatives, **LADWP will work in coordination with city departments and other stakeholders to ensure these critical planning and operational issues are evaluated and addressed.**

---

<sup>1</sup> LADWP has plans to expand recycled water use citywide from about 8,000 acre-feet per year (AFY) [7 million gallons per day (MGD)] to 59,000 AFY (53 MGD), and is proposing the implementation of a groundwater replenishment project in the San Fernando Groundwater Basin using purified recycled water.

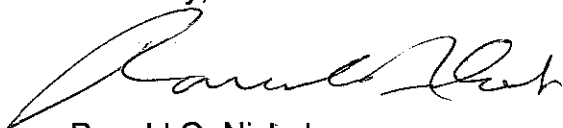
Josephine R. Axt, Ph.D  
Page 3  
November 18, 2013

LADWP commends the work and partnership of the USACE on the LA River. We support the implementation of a viable plan that balances the Report's river restoration objectives with LADWP's mission to "deliver reliable water and power to LA in a customer focused, efficient and environmentally responsible manner." We look forward to collaborating closely with the Army Corps in the development of specific projects as part of the selected Alternative to ensure this critical balance is achieved.

5

Should you have any questions, please contact me at (213) 367-1405 or Ms. Evelyn Cortez-Davis of the LADWP Water Resources Division at (213) 367-2360.

Sincerely,



Ronald O. Nichols  
General Manager

RP:lz

c: Mr. Enrique Zaldivar, Director, Department of Public Works Bureau of Sanitation  
Ms. Carol Armstrong, Department of Public Works Bureau of Engineering, River  
Project Office  
Ms. Evelyn Cortez-Davis



**BENNETT KAYSER***Board Member*

October 17, 2013

Ms. Josephine R. Axt, Ph. D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Attn: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

**Subject: Alternative 20**

Dear Dr. Axt,

As an elected official serving one million-plus children and adult students and over 4.5 million constituents covering 770 square miles, I am writing in resounding support of Alternative 20. The Los Angeles River (LAR) runs right through my Los Angeles Unified School District (LAUSD) Board, District 5. Its value and potential value to the communities I represent is immeasurable.

The LAUSD encompasses much of the Los Angeles River. In fact, the LAUSD has a camp site in the Angeles Crest Mountains named Clear Creek and another outdoor education site at Point Fermin on the San Pedro peninsula; bookends to the story of water in Los Angeles.

I want to further engage the children of LAUSD with the LAR. There are one hundred and twenty-five schools within an easy mile's walk from the river. It is my dream that this generation of LAUSD students will grow up with an ever improving river and that they be an integral part of those changes. I want our students to use the river and its ecosystems for study, recreation, transportation, and career opportunities.

As stated in the movie *Field of Dreams*, "If you build it, they will come". I urge the U.S. Army Corps of Engineers to change course and support the best option for future generations of Los Angeles, Alternative 20.

Sincerely,

Bennett Kayser  
Board Member  
District 5

# Los Angeles Unified School District

## Office of Environmental Health and Safety

JOHN E. DEASY, Ph.D.  
*Superintendent of Schools*

ENRIQUE G. BOULLT  
*Chief Operating Officer*

JOHN STERRITT  
*Director, Environmental Health and Safety*

November 18, 2013

Josephine R. Axt  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053

ATTN: Ms. Erin Jones, CESPL-PD-RN

**SUBJECT: COMMENTS ON THE LOS ANGELES RIVER ECOSYSTEM  
RESTORATION PROJECT – DRAFT INTEGRATED FEASIBILITY  
REPORT AND ENVIRONMENTAL IMPACT  
STATEMENT/ENVIRONMENTAL IMPACT REPORT**

Presented below are public comments submitted on behalf of the Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS), regarding the Draft Integrated Feasibility Report (IFR) prepared for the above project. The IFR presents several Alternatives, all which provide varying levels of restoration to an 11-mile segment of the LA River. The project does not appear to have direct construction impacts on District property or school sites. However, the potential benefits for the District's students and educational community vary greatly by Alternative.

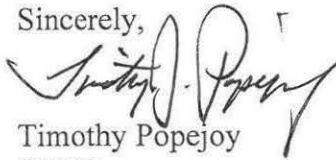
The District has approximately 125 schools within a one-mile radius of the LA River and has several schools located in close proximity to the banks and walls of the river basin. The District views the LA River improvements as providing positive environmental benefits related to riparian habitat and water quality while balancing the need for safety by providing flood control to the region. Even though a secondary purpose of the project, the addition of passive recreational opportunities is of great benefit to the students and families of the District. The creation of unique ecological corridors and places to interact with the riparian habitat would also provide a learning platform for educating youth on sustainability – an important District policy that it endorses and implements in its own operations and facilities.

As such, the District endorses IFR Alternative 20, because it generates the greatest environmental benefits in the areas described above.

It should be noted that the LAUSD Board of Education will vote on November 19, 2013, on a resolution entitled, "Resolution in Support of the Selection of Alternative 20 for the Los Angeles River."

Thank you for the opportunity to comment on this important project. If you need additional information please call me at (213) 241-3913.

Sincerely,



Timothy Popejoy  
OEHS

**Board Member Resolution For Action**

Mr. Kayser, Ms. García - Resolution in Support of the Selection of Alternative 20 for the Los Angeles River  
(Noticed November 12, 2013)

Whereas, Within the Los Angeles Unified School District, the Los Angeles River is the single thread that ties all twenty-six cities and parts of the County of Los Angeles together in this seven hundred and fifty square mile school district;

Whereas, The District is home to the Clear Creek camp site in the Angeles Crest Mountains and a second outdoor education site at Point Fermin on the San Pedro peninsula; truly bookends to the story of water in Los Angeles;

Whereas, The District has approximately one hundred and twenty five (125) schools within a one mile walk of the river and has several schools located along its banks/walls;

Whereas, The District is committed to lessening its impact on the environment and to helping to inform the next generation about their responsibilities to our shared environment;

Whereas, The District is a driving force on sustainability efforts through our solar energy installations and energy and water conservation programs;

Whereas, For more than decade, we have been transforming the District's educational environment by completing 130 new schools to high performance environmentally friendly standards;

Whereas, The District is actively engaged in testing new technology, improving methods of conservation and developing programs on the importance of conserving energy and water resources;

Whereas, It is of the utmost importance that outside of our schools and in the community we have more green space, and revitalize the L.A. River so that it can be a tool for educating youth on sustainability;

Whereas, Only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing critical wildlife habitat connectivity and a hydrological link between the Los Angeles State Historic Park and the river;

Whereas, With approval of Alternative 20, District students can make far greater use of the river and its ecosystems for study, exploration, recreation, transportation, and career opportunities; and

Whereas, Alternative 20 provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from the river's channelization—providing new public access to natural open spaces, expand educational opportunities, improving public health, stimulating regional and local economies, and enhancing the quality of life in Southern California; now, therefore, be it

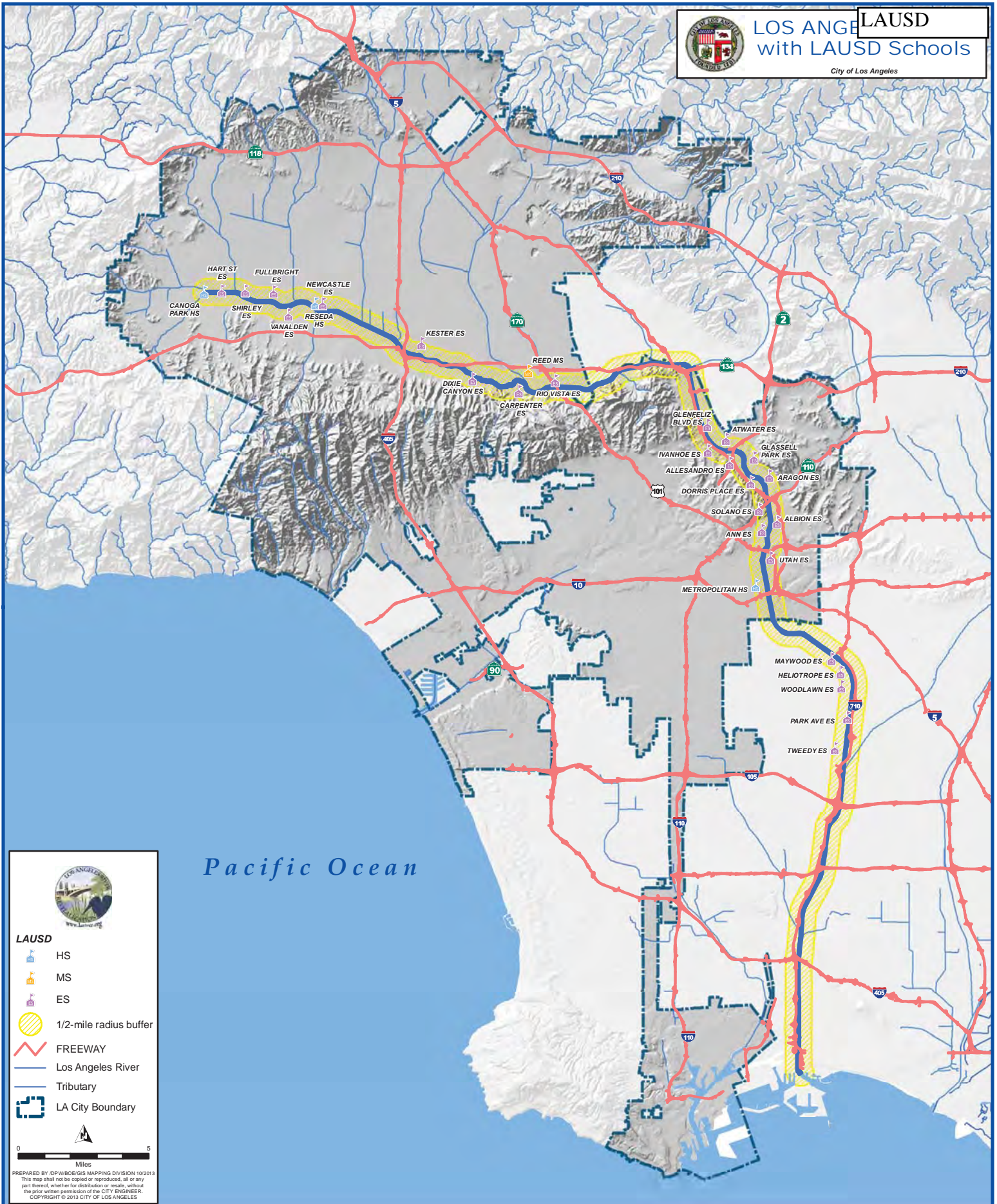



Resolved, That the Governing Board of the Los Angeles Unified School District urges the United States Army Corps of Engineers to change its current course and support the best option for future generations of Los Angeles Unified School District students and their families, Alternative 20.



# LOS ANGELES LAUSD with LAUSD Schools

City of Los Angeles





**LAUSD**

- HS
- MS
- ES
- 1/2-mile radius buffer
- FREEWAY
- Los Angeles River
- Tributary
- LA City Boundary

0 5 Miles

PREPARED BY DPW/GIS MAPPING DIVISION 10/2013  
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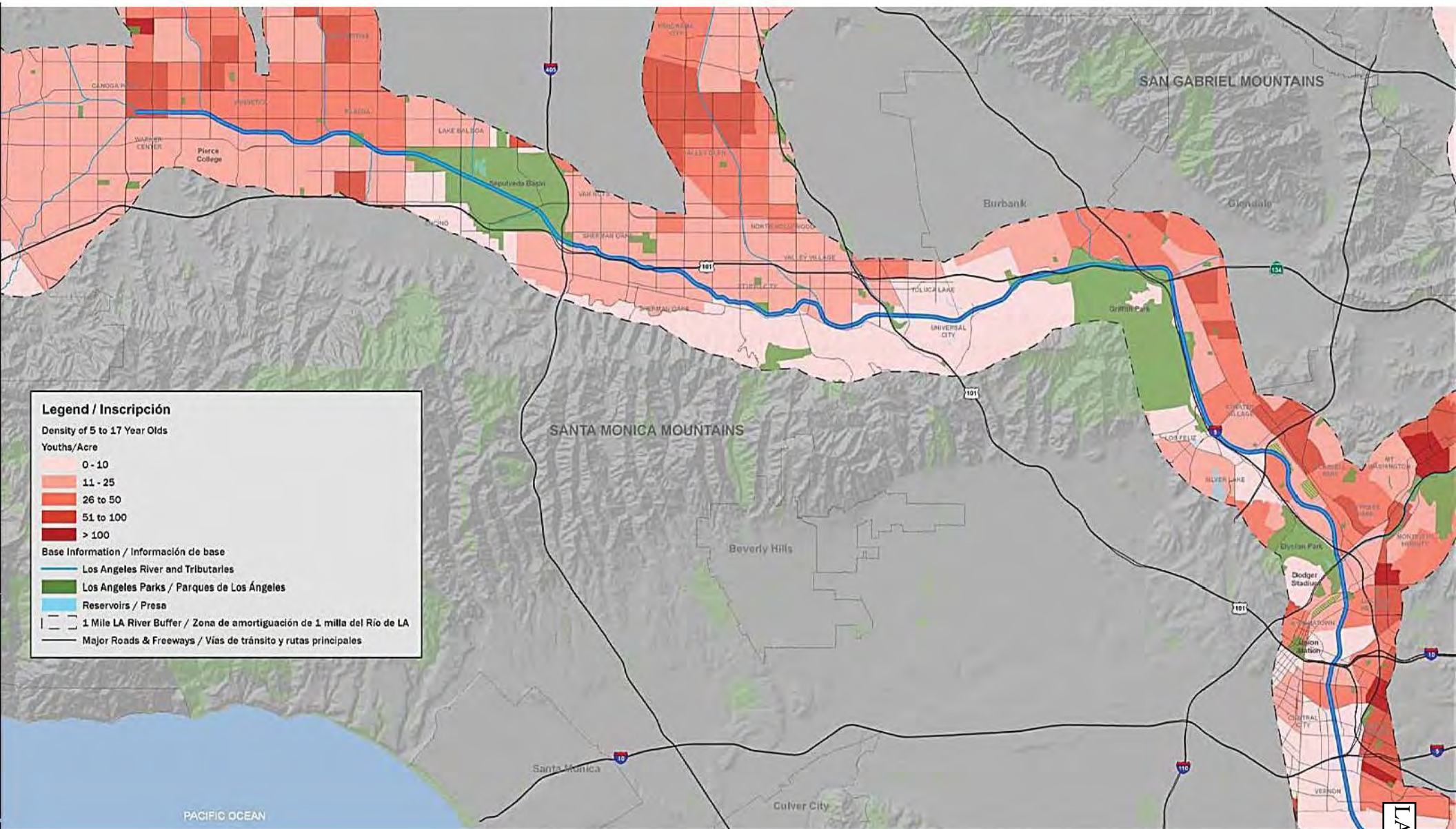
Eric Garcetti  
Mayor

# LOS ANGELES RIVER

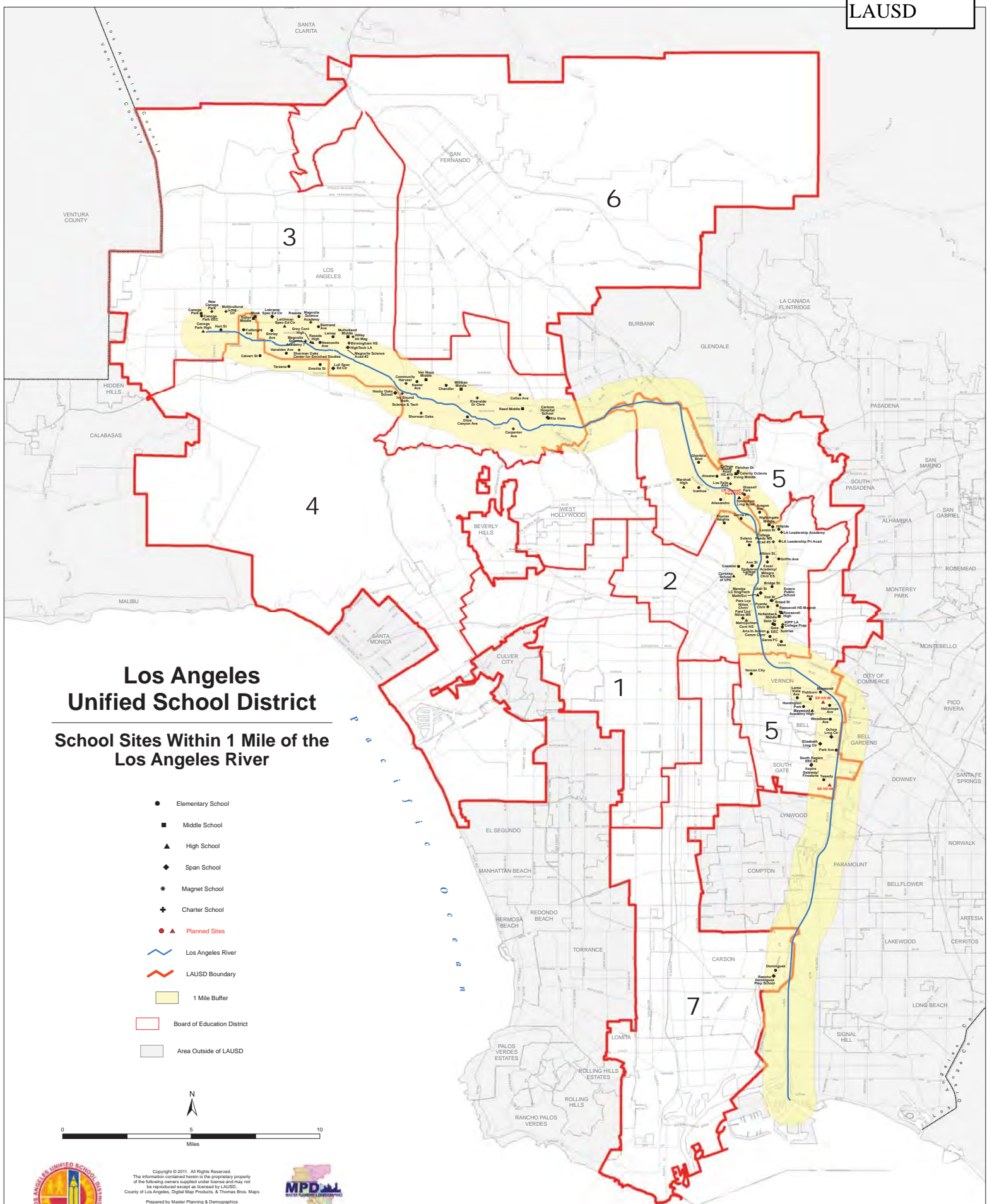


Gary Lee Moore, P.E.  
City Engineer







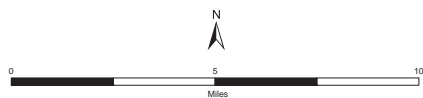




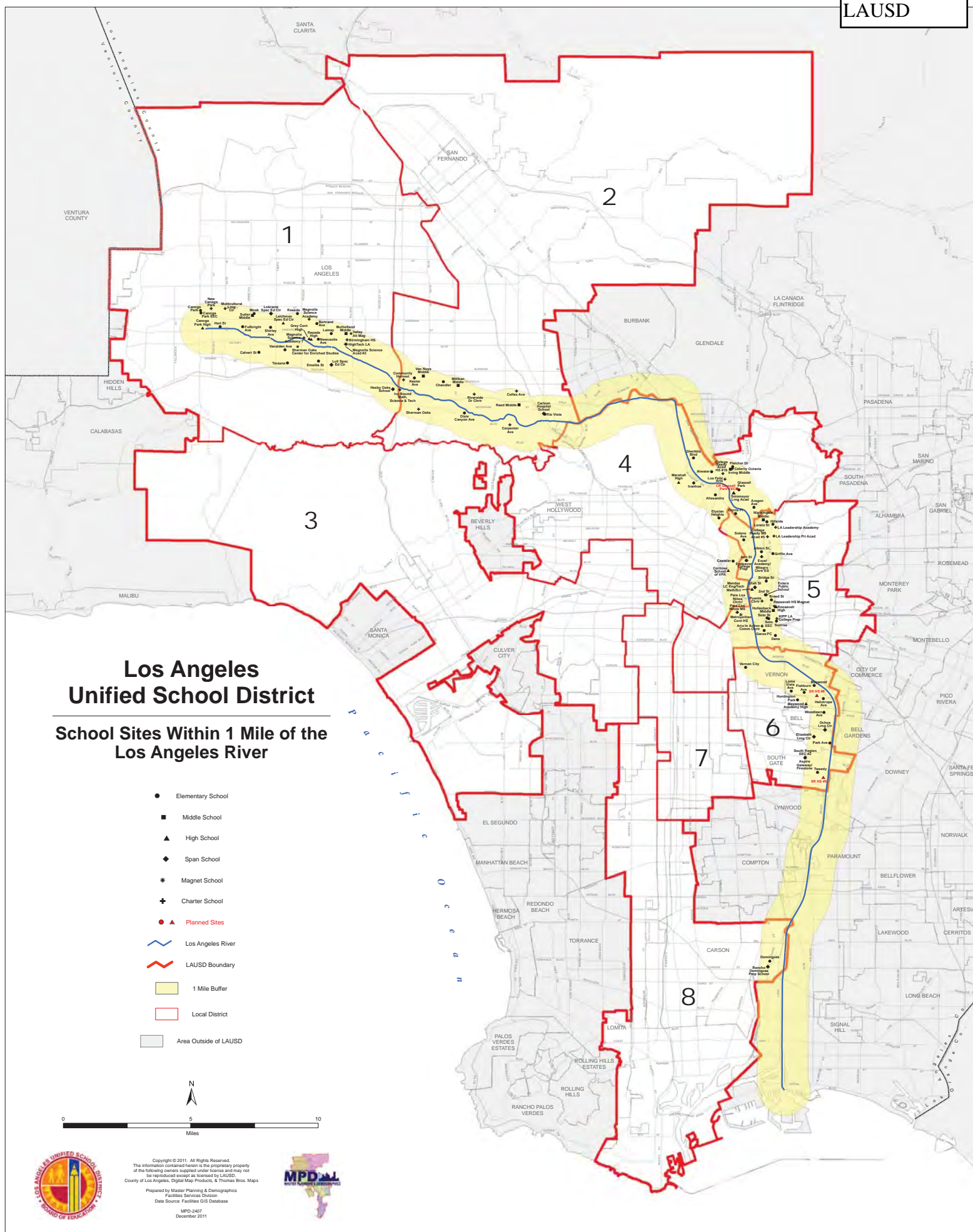
# Los Angeles Unified School District

## School Sites Within 1 Mile of the Los Angeles River

- Elementary School
- Middle School
- ▲ High School
- ◆ Span School
- ✱ Magnet School
- ✚ Charter School
- ▲ Planned Sites
- Los Angeles River
- LAUSD Boundary
- 1 Mile Buffer
- Local District
- Area Outside of LAUSD



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Facilities Services Division  
Data Source: Facilities GIS Database  
MPO-2407  
December 2011





November 18, 2013

Ms. Josephine Axt  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Attn: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

**VIA EMAIL TO:** [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

**Re: Comments on Draft Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration Study**

Dear Ms. Jones:

The City of Burbank has reviewed the Draft Integrated Feasibility Report (IFR) for the Los Angeles River Ecosystem Restoration Study, and respectfully submits the following comments. Due to the proximity of the project site to the City of Burbank, the City has concerns about the project and the impacts it may have on Burbank streets, residents, and businesses.

**Burbank2035 General Plan**

On February 19, 2013, the Burbank City Council certified an Environmental Impact Report and adopted the Burbank2035 General Plan. All references in the IFR to the draft Burbank2035 General Plan and its contents should be updated. The City additionally requests that the IFR include a more thorough analysis of the proposed project's consistency with Burbank2035 goals and policies relating to land use, mobility, parks and open space, noise, and safety. Throughout the document, a thorough analysis of impacts to the City is deferred, with the rationale being that a comprehensive update to the General Plan is in process. The Burbank2035 General Plan has been adopted and its contents are being implemented in the community. Staff asserts that the IFR should reflect this.

Additional information related to existing conditions in the City at the time the Burbank2035 General Plan was prepared can be found in a Technical Background Report. The Corps may wish to utilize these resources when preparing the Final IFR, specifically information regarding the City's population, socio-economic characteristics, and parks inventory and acreage. All documents are available for review online at [www.burbank2035.com](http://www.burbank2035.com).

**Recreation & Trails**

The City recognizes that recreation is a secondary benefit of this project. Although the project includes features having the least impact on the ecosystem such as wildlife viewing and walking, the City believes that any recreational transportation facilities, such as bicycle, pedestrian, or

equestrian paths or trails connect to existing and planned facilities in the City of Burbank. In particular, the project should identify locations for potential connections to facilities identified on the City's Bicycle Master Plan and Burbank2035 General Plan. The plan should also ensure that existing equestrian trails along the LA River in and near Burbank are maintained, and new opportunities for equestrian connections to appropriate recreational areas are included where feasible.

2

### **Traffic & Circulation**

Section 5.7.2, Significance Criteria, states that the City of Burbank does not have CEQA traffic significance thresholds for use in evaluating the traffic impacts of projects. The City has thresholds for traffic "operational" impacts. These thresholds are contained in the City's Interim Traffic Study Guidelines and are attached to this letter. The IFR should estimate the number of weekday AM and PM peak hour trips that will be generated by the proposed recreational uses and show that these uses do not cause a significant impact on any intersections within the City of Burbank. The IFR asserts that no weekday peak hour trips will be generated by the proposed recreational uses but does not provide any supporting information or assumptions that support this assertion.

3

### **Construction Hours**

The Burbank Municipal Code specifies that construction for which a permit is issued may occur Monday through Friday from 7:00 a.m. to 7:00 p.m. and Saturday from 8:00 a.m. to 5:00 p.m. Construction is not allowed on Sunday and City holidays. Any construction and/or construction staging related to the proposed project, occurring in or adjacent to the City of Burbank, should be limited to these hours.

4

### **Potential Temporary Construction Staging Areas**

The IFR designates that an area generally located along SR 134 and Riverside Drive may be utilized as a temporary construction staging and/or parking area for workers and equipment. Under Alternative 13, construction would occur over 282 days and it is anticipated that the temporary construction staging area would be used for a similar length of time. In addition, the report states that areas having aesthetic, recreational, open space, or habitat value would be avoided to the extent possible. The City has concerns about utilizing an area near single-family residences for construction staging and/or parking. In addition, the City asserts that the proposed temporary staging area is highly valued by residents of the Rancho Equestrian neighborhood. It serves as an equestrian corridor and is frequently used by nearby residents to exercise their horses. The City believes this area should be avoided for construction staging and/or parking.

5

### **Construction of Traffic & Utility Management Plan**

The IFR indicates that a construction traffic management plan will be prepared and submitted to LADOT for review and approval prior to project implementation to ensure that construction impacts are minimized. The plan would include:

6

- Designated haul routes and access points for construction vehicles and equipment,

- Any turning movement restrictions,
- Travel time restrictions to avoid peak travel periods on selected roadways, and
- Designated staging and parking areas for workers and equipment.

To ensure construction impacts to City streets, intersections, or bike lanes are minimized, staff believes the construction traffic management plan should be submitted to the City of Burbank Public Works Director for review and approval prior to project implementation. Similar to the traffic management plan, the IFR specifies preparation of utility and stormwater management plans, prior to construction, to ensure that impacts are less than significant. Staff asserts that these plans should be circulated to the City for review to ensure that no adverse impacts to public utilities facilities owned and/or operated by the City occur.

6

#### **Selection of Preferred Alternative**

The City understands that the U.S. Army Corps of Engineers (Corps) has determined that Alternative 13 is the most cost effective option when compared to the benefit received. While Alternative 13 has been tentatively selected, the Corps has the ability to alter their selection at the conclusion of the public comment period. Should the Corps elect to proceed with a different Alternative, the City believes the Draft IFR should be recirculated to afford all interested parties with an opportunity to review the project in light of the new alternative selected.

7

Thank you in advance for your attention to the concerns raised in this letter. Should you have any question or concerns, please contact Tracy Steinkruger, Senior Planner at (818) 238-5250 or [TSteinkruger@burbankca.gov](mailto:TSteinkruger@burbankca.gov).

Sincerely,  
Community Development Department



Tracy Steinkruger  
Senior Planner

Cc: Joy Forbes, Community Development Director  
Carol Barrett, Assistant Community Development Director

Attachment: Interim Traffic Study Guidelines

Attachments are on file  
at USACE, LA District.  
Available upon request.



**RESOLUTION NO. 13-194**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF GLENDALE, CALIFORNIA  
RECOMMENDING THE SELECTION OF ALTERNATIVE 20 IN THE LOS ANGELES RIVER  
ECOSYSTEM RESTORATION INTEGRATED FEASIBILITY REPORT  
AS THE RECOMMENDED/NATIONAL ECOSYSTEM RESTORATION (NER) PLAN**

WHEREAS, the City of Glendale has nearly a mile of river frontage on the north and east banks of the Los Angeles River stretching from Bette Davis Park in the City of Los Angeles on the west to the Verdugo Wash in the City of Glendale on the south; and

WHEREAS the City of Glendale has completed Phase I of the Glendale Narrows Riverwalk project which includes one-half mile of pedestrian-bicycle path, two parks, and an equestrian facility along the banks of river; and

WHEREAS the City of Glendale has funding in place for Phase II of the Glendale Narrows Riverwalk project which will include a connection to Phase I, a river overlook, and a pedestrian-bicycle path that will lead to a park at the confluence of the Verdugo Wash and the Los Angeles River; and

WHEREAS, the State of California, the County of Los Angeles, and the City of Glendale have made significant investments in the City's Riverwalk Project totaling nearly \$4 million; and

WHEREAS, when the project is completed, Glendale will have devoted one hundred percent of its river frontage to restoration and passive recreation; and

WHEREAS, the U.S. Army Corps of Engineers has released the Los Angeles River Ecosystem Restoration Integrated Feasibility Report which evaluates alternatives for the purpose of restoring eleven miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles, while maintaining existing levels of flood risk management; and

WHEREAS, restoration measures considered include creation and reestablishment of historic riparian and freshwater marsh habitat to support increased populations of wildlife and enhance habitat connectivity within the study area, as well as to provide opportunities for connectivity to ecological zones, such as the Verdugo Mountains and San Gabriel Mountains which lie within the City of Glendale; and


WHEREAS, the Study presents a final array of alternatives which include Alternatives 10, 13, 16, and 20 and has indicated that its Tentatively Selected Plan is Alternative 13; and

WHEREAS, only Alternative 20 includes significant restoration at the Los Angeles River's confluence with the Verdugo Wash near Glendale's border with the City of Los Angeles; and


WHEREAS, only Alternative 20 will create a truly functional and interconnected watershed that will restore the functionality of the Los Angeles River as a critical natural, cultural, and community resource.

NOW THEREFORE, BE IT RESOLVED that the Council of the City of Glendale hereby endorses Alternative 20 of the Los Angeles River Ecosystem Restoration Integrated Feasibility Report and urges the United States Army Corps of Engineers to select Alternative 20 as its Recommended/National Ecosystem Restoration (NER) Plan

Adopted this 29th day of October, 2013

  
Mayor

ATTEST:

  
City Clerk

STATE OF CALIFORNIA                     )  
COUNTY OF LOS ANGELES            )SS.  
CITY OF GLENDALE                     )

I, ARDASHES KASSAKHIAN, City Clerk of the City of Glendale, do hereby certify that the forgoing Resolution No. 13-194 was adopted by the Council of the City of Glendale California, at a regular meeting held on the 29th day of October, 2013, and that same was adopted by the following vote:

Ayes: Friedman, Quintero, Sinanyan

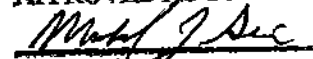
Noes: Weaver

Absent: None

Abstain: Najarian

  
City Clerk

APPROVED AS TO FORM

  
City Attorney

DATE 10/14/13

Todd Rogers  
Vice Mayor

Diane DuBois  
Council Member



Jeff Wood  
Council Member

Ron Piazza  
Council Member

October 2, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles California 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Re: Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report  
City of Lakewood Comments

Dear Dr. Axt:

The City of Lakewood appreciates the opportunity to comment on the Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report (IFR). We are part of southeastern Los Angeles County, located in the area known as the Gateway Region. As such, we are impacted by any developments along the Los Angeles River, and we are particularly concerned with how these developments may affect the flood conveyance capabilities of the river.

As you know, the Los Angeles River originally was a meandering body of water whose course ran freely across the flood plain that is now present day Los Angeles, Long Beach, and other cities. The river's path changed from year to year, with its mouth moving from as far south as Seal Beach to Santa Monica Bay to the north. The 1938 flood killed 115 people and caused \$40 million in damages (*compared to today's standards that equates to \$643 million in a rural area*). This disaster prompted the U.S. Army Corps of Engineers to channelize the river for flood control measures. Since then, its primary purpose has been to serve as a flood control channel for the greater Los Angeles/Long Beach area.

At this early stage, the IFR does not yet address how the selected alternative (Alternative 13) will affect the flood control capabilities of the Los Angeles River. Section 5-39, lines 3-12, states: "*Any work that may affect flood elevations will be coordinated with FEMA (Federal Emergency Management Agency).*" We are especially concerned with anything that affects the flood control capabilities of the river because on two occasions (2002 and 2012), the federal government tried to impose costly flood insurance on federally backed mortgages in "residual risk" areas (of which Lakewood and other communities along the river were a part) even though these areas already have 100-year protection in place. Compromising the river in any way would be costly to our residents.

# Lakewood

Josephine R. Axt, Ph.D.

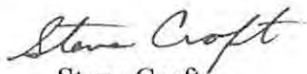
October 3, 2013

Page 2

Alternative 13 proposes to restore an 11-mile stretch of the river from Griffith Park to downtown Los Angeles, including removing concrete from the river bottom at its confluence with the Arroyo Seco and widening the river by 300 feet to form a freshwater marsh in an area known as Taylor Yard, near Glassell Park. While the impact of such a change seems minimal in terms of the river's total length of 48 miles, at this stage it is still unknown if and how the proposed changes will affect the flood control capabilities of the river. In addition, combined with FEMA's penchant for unilaterally attempting to impose flood insurance requirements and their scheduled updating of the West Coast flood maps in 2016, we are very concerned with how those factors will negatively affect flood insurance rates in the future. We request that you minimize or even eliminate any probable changes to the flood control capabilities of the Los Angeles River as Alternative 13 is further developed.

If you have any questions about the City's feedback on the draft Integrated Feasibility Report, please feel free to contact Paolo Beltran at 562/866-9771, ext. 2129 or [pbeltran@lakewoodcity.org](mailto:pbeltran@lakewoodcity.org).

Sincerely,



Steve Croft

Mayor



November 12, 2013

Josephine Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

As the Director of Government and Public Affairs for the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am writing to share our profound support for Alternative 20 of the US Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (Study).

Alternative 20 will deliver the best return for our investment and facilitates the greatest potential for catalyzing long-lasting benefits to our economy and well-being as citizens.

The Study area focus on a key 11-mile stretch of the 51-mile river near Downtown LA, which includes some of the region's most historically-underserved neighborhoods, will magnify investments already being made and attract future partnerships like never before. We know that large-scale investments in improving and strengthening our multi-benefit public infrastructure—like the LA River—send a strong message to people in communities throughout our region: that they deserve world-class public service and waterway revitalization worthy of a great global destination.

USACE has built a remarkable flood protection system that includes the LA River, but the environmental damage and community blight resulting from the river's channelization have become obvious. While the mission of the Study is ecosystem restoration and the USACE-preferred Alternative 13 minimally meets the Study objectives, Alternative 20 will clearly provide the most ecosystem restoration and will also provide *four times more jobs* and *three times more income* for only twice the investment as Alternative 13. Alternative 20 would provide over 9,000 direct jobs and add more than \$1 billion direct dollars to the gross national product. Moreover, the Study estimates that, including effects from redevelopment, over 16,000 jobs and nearly \$5 billion will result. Alternative 20 also reflects a more equitable cost-sharing partnership—with the local sponsor paying approximately 50% versus Alternative 13, which requires the local sponsor to pay almost 70%.

This Study has taken seven years to complete—at a cost of nearly \$10 million—and its recommended project will take many more years to implement. However, we must now decide the extent of our commitment so that we may initiate the grassroots work it takes to achieve the most meaningful, expansive restoration in partnership with the federal government. We will not have another chance to make such a bold, sweeping statement in bringing nature back to our post-industrial landscape.

An investment in the Study is an investment in our people—our residents, our workers, our students, our businesses, our families, and the community institutions that serve them. Because of this, AIA|LA supports Alternative 20 as the most appropriate plan. Fundamentally, we understand that transformation of the LA River will result in an improved regional quality-of-life and that its successes will be felt here and abroad for many years to come. AIA|LA looks forward to being a partner in that transformation.

Very truly yours,



Will Wright  
Director, Government & Public Affairs  
AIA Los Angeles



ARC

## Alliance of River Communities

Arroyo Seco NC | Atwater Village NC | Boyle Heights NC  
Eagle Rock NC | Elysian Valley Riverside NC | Glassell Park NC  
Greater Cypress Park NC | Greater Echo Park Elysian NC  
Historic Highland Park NC | LA 32 NC | Lincoln Heights NC  
Los Feliz NC | Rampart Village NC | Silver Lake NC

October 25, 2013: Press Contact: Hector Huezo, [H.L.Huezo@gmail.com](mailto:H.L.Huezo@gmail.com)

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

At a regular meeting of the Neighborhood Council Alliance of River Communities, the member representatives of the alliance consented on submitting the following resolution regarding U.S Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report:

WHEREAS, the Los Angeles River is the lifeblood of our community and a vital resource to be restored and protected; and

WHEREAS, in 2006, the Los Angeles City Council approved an agreement with the US Army Corps of Engineers (Corps) for the Los Angeles River Ecosystem Restoration Feasibility Study (Study); and

WHEREAS, in 2013, the Corps has developed a final array of four alternatives for the Study, and only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing a profound hydrological link between the Los Angeles State Historic Park and the river; and

WHEREAS, these two areas provide critical wildlife habitat connectivity to the Verdugo and Elysian Hills, respectively, and are included in the five key opportunity areas of the City Council-adopted Los Angeles River Revitalization Master Plan, which the US Congress directed the Corps to consider; and

WHEREAS, **Alternative 20** provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from the river's channelization—providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles

***NOW, THEREFORE BE IT RESOLVED, that the Alliance of River Communities supports the selection and full implementation of Alternative 20 by the United States Army Corps of Engineers to restore our Los Angeles River.***

Sincerely,  
The Neighborhood Council Alliance of River Communities, ARC

[Facebook.com/ARCLosAngeles](https://Facebook.com/ARCLosAngeles) | [@ARCLosAngeles](https://twitter.com/ARCLosAngeles) | [ARC@EmpowerLA.org](mailto:ARC@EmpowerLA.org)



**From:** [Emily Nerad](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] Alternative Apparel comment letter for Los Angeles River Ecosystem Study  
**Date:** Sunday, November 17, 2013 8:31:07 PM

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Sunday, November 17, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD -RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

My name is Emily Nerad and I am writing on behalf of the LA based brand Alternative Apparel. Earlier this year we met Karin Flores of Friends of the LA River who guided our design team on an educational tour of the River. After our first visit it became evident that the LA River is a truly special part of the community, culture and spirit of our hometown. We knew we wanted to do everything we could to educate our friends and partners about this hidden gem and put our efforts behind its revitalization in any way possible. We even chose to utilize the beautifully diverse setting of the River as the location to photograph our Spring 2014 lookbook, emphasizing the importance of embracing one's community.

This fall we hosted a presentation by Lewis McAdams of FoLAR, Dr. Carol Armstrong and the architects' collective behind the Piggyback Yard project at our DTLA Design Studio. We invited our friends, neighbors, press and colleagues to learn about the history of the river, their plans for revitalization and what Alternative 20 would mean for not only the LA River but also its surrounding communities. We now know the incredible impact these plans would have on recreational areas in current park poor neighborhoods, connectivity between waterways and ecosystems, native wildlife, and jobs, and we are dedicated to creating a better balance of our environment and urban community.

We appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. We're thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration. After receiving an introduction to the proposals from Dr. Carol Armstrong and reviewing the report in detail, we are providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, we found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with national initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership that recognize the importance of the LA River to habitats, species and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. city

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal and hydrology (205% greater than 13)

- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7,015 more jobs and \$386 million more in wages during construction
  - Creates 3,700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1,094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to our City and us! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Emily Nerad on behalf of Alternative Apparel

Alternative Apparel  
833 S. Spring Street, 4th Floor  
Los Angeles, CA 90014  
[www.alternativeapparel.com](http://www.alternativeapparel.com)

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**IMPRINT PROJECTS**  
EMILY NERAD

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## ARIDLANDSINSTITUTE

@ Woodbury University

DESIGN INNOVATION AT THE NEXUS OF WATER, ENERGY, AND CLIMATE CHANGE

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Friday, November 15th, 2013

Josephine Axt, Ph.D.

Chief, Planning Division

U.S. Army Corps of Engineers

P.O. Box 532711

Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study

Dear Dr. Axt:

The Arid Lands Institute (ALI) is a research, education, and outreach center of Woodbury University dedicated to water scarcity and design of the built environment. ALI's mission is to train design professionals and citizens to innovate in the face of hydrologic variability brought on by climate change. Our vision is an inspiring water-smart built environment in the US West serving as a model for drylands globally.

Nowhere is the opportunity for water-smart design leadership greater, or more necessary, than in our hometown of Los Angeles. ALI strongly supports Alternative 20 of the US Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (Study).

As others have argued, Alternative 20 offers the greatest advantages in terms of ecosystem restoration and economic opportunity within the study area. From our vantage point as researchers and designers, it also offers the highest long-term potentials for transforming civic space and hydrologic function, city-wide. We support Alternative 20 for the following reasons:

**1. Quality Public Space**

As design professionals and educators working with architects, landscape architects, urban designers, planners, and public artists around the world, we recognize that Alternative 20 offers something no other alternative offers: the potential for high quality public space.

Alternative 20 offers continuity and connectivity across a ribbon of LA River and adjacent land that Alternative 13 does not. Continuity is critically important if the LA River is to realize its potential as a catalyst for healthy, accessible, attractive open space at the heart of the city, rather than as a series of disconnected nodes. Many cities, from Seoul to San Antonio to Providence, have transformed their economies, their civic identities, and their pride of place through continuous linear, riparian projects

running through their historic urban core. Likewise, New York's HighLine is oft-cited as a precedent for the kind of successful public space the river could support. Obviously none of these projects could have attained the success they did if realized as disconnected nodes. Public investment in Alternative 20 will benefit Los Angelenos through increased mobility, access, and equity in historically important and ecologically sensitive stretches of the city, many of them underserved and isolated from open space access. Alternative 20 offers greater opportunity than other alternatives for small-scale micro development of neighborhood-scale public spaces to grow from it in the future.

## **2. Climate Adaptation and Sustainable Hydrologic Function:**

Alternative 20 is the option that makes long-term sense in the context of resilience planning and climate adaptation. As climate change reduces snow pack levels that are the basis of LA's imported water supply, stormwater once perceived as waste and/or flood threat will be embraced as asset, a source of groundwater augmentation. Of the one-million acre-feet of stormwater that runs off LA's urban surfaces each year, less than half is captured for groundwater recharge; 520,000 acre-feet are sent as discharge to the Pacific Ocean each year.

ALI recently completed high-resolution geospatial modeling of the Upper Los Angeles River Watershed, commissioned by the World Water Forum and MWD. The study area focuses on the San Fernando Valley basin, the largest catchment area feeding into the LA River. ALI's model identifies precise locations across 200 square miles of the San Fernando Valley where stormwater can be plausibly harvested, stored, infiltrated, and treated using low-impact best management practices. The peer-reviewed model, using 30-year precipitation averages, suggests that 92,000 acre-feet can be harvested. (This is more conservative than the 120,000 acre feet suggested by the groundwater augmentation model developed by the U.S. Department of Interior, Bureau of Reclamation and Council for Watershed Health). This figure is significant not only in terms of water supply—92,000 acre-feet would meet the needs of 500,000 citizens, or half the population of the Valley, at current usage rates. It is also significant in terms of flood control: it represents a 20% reduction of stormwater loads on LA's flood control system as a whole.

The transformation of the LA River to a more permeable cityscape is one important part of a basin-wide climate adaptation strategy. More so than any other alternative, Alternative 20 will catalyze and accelerate LA's long-term investment in resilience—a more absorbent city, a less flood-prone city, and a city of vibrant public space adapted to life in drylands, one that models best practices for water-stressed environments globally.

Sincerely,

Hadley Arnold, Executive Director  
Peter Arnold, Research Director

# ARROYO SECO FOUNDATION

Arroyo Seco

570 W. Avenue 26, Suite 450, Los Angeles, California 90065-1011  
(323) 405-7326 | [www.ArroyoSeco.org](http://www.ArroyoSeco.org)

November 15, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

## **Re: Comments on Los Angeles River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

The Arroyo Seco Foundation is writing to express our strong support for Alternative 20 of the Los Angeles River Ecosystem Restoration Feasibility Study. We are a 501(c)(3) nonprofit organization in the Arroyo Seco subwatershed of the Los Angeles River, and our work strives for the preservation and enhancement of local waterways through watershed management projects, advocacy and community engagement. Initially founded by Charles Fletcher Lummis more than one hundred years ago, our current leadership has been actively championing sustainable natural resource management since the 1980s. Our members and supporters include experts of diverse backgrounds, including hydrology, biology, ecology, water resource management, and urban planning. We applaud the U.S. Army Corps of Engineers (USACE) for recognizing the importance of the Arroyo Seco Confluence for Los Angeles River restoration in the three major alternatives presented; however, we must consider the Study holistically, and only Alternative 20 succeeds in meeting the evaluation criteria.

The Area with Restoration Benefits and Opportunities for Revitalization (ARBOR) is situated in one of only three biodiversity hotspots in the United States, the California Floristic Province, which has been severely diminished by extensive urban and agricultural development. Biodiversity is key to ecological resiliency, and multiple current trends such as global climate change and population growth call into question how wildlife will adapt to future conditions in the nation's second largest city. It is vital to the health of our region that open space projects are designed to take into account and mitigate losses in biodiversity, and we need to promote conditions where more diverse species populations can thrive. Alternative 20 is the only alternative that includes both major confluences in the ARBOR, the Arroyo Seco and Verdugo Wash, and creates a direct hydrological linkage between the river and Los Angeles State Historic Park. The variety of habitat conditions created by Alternative 20 will best prepare the Los Angeles region for future climatic conditions by most completely and effectively restoring the ecological integrity of the Los Angeles River.

The Los Angeles River underwent severe ecological degradation as a result of the USACE's construction of a concrete-lined channel to reduce flood hazard risk by containing flood flows within

the main river channel. Today, after more than eighty years of neglect, the river still has immense potential to foster abundant biodiversity and provide habitat connectivity throughout the Los Angeles Basin and surrounding mountainous regions, while maintaining the same protection against flood hazards.

Concrete removal reconnects the river with soil and restores ecological processes dependent upon this condition. The reestablishment of wildlife corridors for birds and land animals addressed in the other alternatives is important, but we feel that all the niches and natural processes that create healthy ecosystems also need to be addressed. The hydrological interface between the river and Piggyback Yard introduced in Alternative 16 is a step in the right direction, but Alternative 20 more completely reconnects the river with its natural bed by restoring the Verdugo Wash Confluence and connecting 32 acres of existing parkland to the river. Alternative 20 will also enhance the biological connection between Los Angeles State Historic Park on the west side of the Los Angeles River with the Arroyo Seco and its watershed on the east side. Alternative 20 is the only option that allows wildlife corridors to cross the river, breaching barriers such as the existing vertical channel walls and railroad facilities, and providing terrestrial linkages between the Los Angeles River, the Arroyo Seco and the Santa Monica Mountains.

As part of our program, the Arroyo Seco Foundation engages with community members to educate them about our natural heritage, ecology, and the need for sustaining healthy water resources. The Los Angeles River Watershed is home to remarkable socioeconomic disparity, with the communities in and around the ARBOR being some of its most disadvantaged and deficient in open space. We have found that this disconnection from nature fosters an environmentally careless society, and intervention is often necessary to instill environmental stewardship. Access to wildlife area is the most effective tool to accomplish this. Particularly with youth, exposure to natural habitat through passive recreation and educational programs promotes a lifelong bond with nature that changes behavior. We envision new development paradigms that fulfill human needs in environmentally sensitive manners and move us away from a pattern of trying to undo the past, but we cannot expect to see that dream realized if our future decision-makers are raised in environments that alienate them nature. Alternative 20, with sites accessible from the urban centers of Los Angeles and Glendale, is most effective and complete in moving us closer to that goal.

The picturesque landscape that the ARBOR occupies has historically attracted residents from all over the world; however, modern economic conditions and sociological phenomena have fueled a return to our urban cores, and Los Angeles is no exception. Proximity and a variety of sustainable transportation options make the ARBOR a place that will be both conveniently accessible and, more importantly, socially equitable in relation to changing land-use and transportation paradigms.

The ARBOR overlaps with other project areas that would magnify its environmental benefits and vice versa. The Santa Monica Mountains Conservancy's Rim of the Valley Corridor, now being studied by the National Parks Service for federal status, already connects the ARBOR with important wilderness areas in Southern California, including the Santa Monica Mountains, the Verdugo Mountains, and the Angeles National Forest. Likewise, the Juan Bautista de Anza National Historic Trail, which connects with Los Angeles State Historic Park, brings recreational users to the



ARBOR and, under Alternative 20, would present them with a river experience much closer to that of De Anza's expedition. The Los Angeles River Revitalization Master Plan and the Cornfields Arroyo Seco Specific Plan invite new development to the ARBOR and surrounding communities and underscore the need for the enhancement of open space and habitat restoration in the area.

Additionally, the USACE is preparing a similar ecosystem restoration feasibility study for the adjacent Arroyo Seco Watershed, which will restore eleven miles of the Arroyo Seco River. These restoration programs have the potential to restore a combined 22 miles of urban river, connecting the wildlife corridors of the San Gabriel Mountains directly with the Santa Monica Mountains, the Verdugo Mountains and downtown Los Angeles. Alternative 20 takes full advantage of the potential for ecosystem restoration and connectivity in an area that has seen severe environmental degradation over the past century. With the restoration of the Verdugo Wash Confluence, which is only available in Alternative 20, these two programs will complete a loop of habitat and wildlife connectivity.

Alternative 20 is the only complete, effective, efficient, and acceptable plan under consideration. Los Angeles Mayor Eric Garcetti and the Los Angeles City Council have expressed enthusiastic willingness to invest half a billion dollars in ARBOR restoration, and community support for river restoration is at an all-time high. On behalf of our members and all those who love the Los Angeles River, the Arroyo Seco Foundation calls on the USACE to approve Alternative 20 and authorize the funds required to make it a reality for millions of Angelenos and generations to come.

Sincerely,



Tim Brick  
Managing Director  
tim@arroyoseco.org



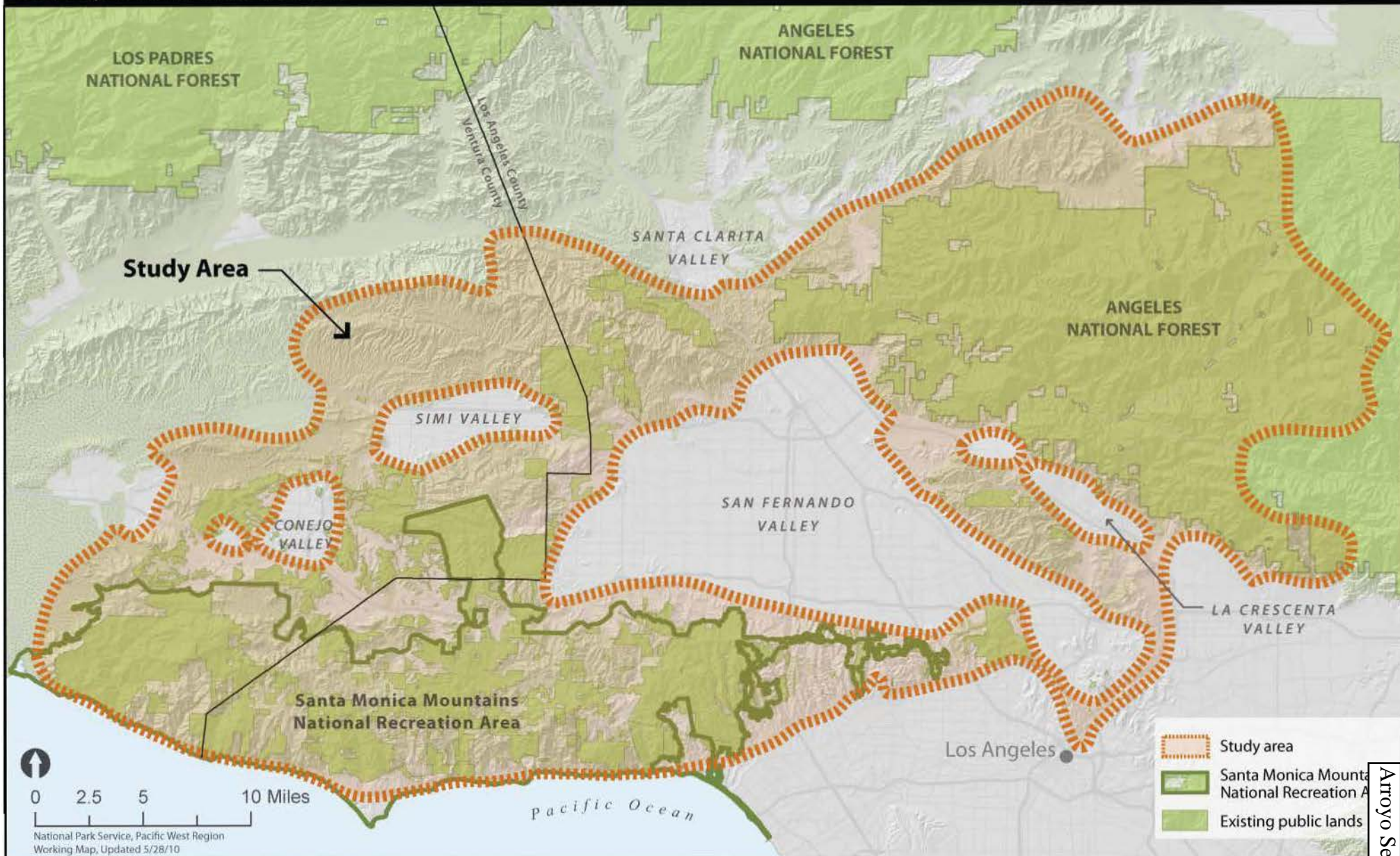
Scott Cher  
Watershed Coordinator  
scott@arroyoseco.org

Enclosures (2)  
Rim of the Valley Study Area  
Connectivity Concept Framework

# Rim of the Valley Corridor Special Resource Study Area

National Park Service

U.S. Department of the Interior





## 4.1 CONCEPT FRAMEWORK

### 1. RECOVERING

- Recovering the river corridor for providing an outline and structure for the infrastructure of green space.

### 2. INTEGRATING

- Integrating natural systems and building green streets for linking with the mountains and the river.
- Reconnecting the city and people to the river. Give the people access to a new, green, natural water's edge.



Prepared by Yingjun Hu  
yingjunh@usc.edu

## ARTHUR GOLDING AND ASSOCIATES

ARCHITECTS URBAN DESIGNERS

15 November 2013

Josephine R. Axt, PhD, Chief, Planning Division  
US Army Corps of Engineers, Los Angeles District  
PO Box 532711  
ATTN: Ms. Erin Jones CESPL-PD-RN  
Los Angeles, California 90053-2325

via email: comments.lariverstudy@usace.army.mil

Reference: Los Angeles River Ecosystem Restoration Feasibility Study  
Draft Integrated Feasibility Report

Dr. Axt:

I offer the following comments on the ARBOR study report. At the end of this letter I append a brief summary of my involvement over the past 25 years with the Los Angeles River and the double watershed of the Los Angeles and San Gabriel Rivers.

### Resilience

While habitat restoration and connectivity is the principal focus of the present study (E.5.PlanningObjectives, I.I.I Purpose), flood protection remains a critical mission of the US Army Corps of Engineers (Corps) and a critical function of the river system. For the last 25 years, river advocates have proposed revitalizing the River while maintaining the existing level of flood protection, and this is a premise of the Los Angeles County Los Angeles River Master Plan of 1996 and of the City of Los Angeles Los Angeles River Revitalization Master Plan of 2007. The ARBOR study draft report also adopts this premise (I.I.I Purpose).

Now in the context of climate change, with the proliferation of severe weather events, it is prudent to think beyond simply maintaining the current level of flood protection, and to seek ways to augment it. The existing channelized River is inflexible; its flood protection capacity is fixed. A reconfigured River with many open spaces, large and small, designed to accept stormwater and to reconnect the River to portions of its historic floodplain (I.I.I Purpose) can also be designed to augment capacity to accommodate more severe and more frequent storms.

Implementation of any level of ecosystem restoration in the ARBOR reaches will be a multi-year undertaking, and during the next decade, both the Corps and the Flood Control District of the County of Los Angeles may well need to revisit their design storm assumptions. So, while maintaining the existing level of flood protection is the stated prerequisite for restoration in the draft report, including the potential to enhance flood protection is likely to be not only desirable but necessary. As land acquisition and design move forward, augmented flood protection can be incorporated into the reconfigured River. Alternative 20, which includes significantly more land acquisition and additional flood plain areas connecting to key tributaries, offers the best path toward a more resilient river system.

Here it is important for planners and policymakers to look forward. As large an undertaking as the proposed ecosystem restoration is, even under the most extensive alternate under consideration, it is only a beginning.



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**Page Two**

15 November 2013  
Josephine R. Axt, PhD

Future ecological restoration and development of recreational open spaces incorporating flood management along the tributaries, at the estuary, in the upper reaches of the mainstem and even along some of the lower urbanized reaches, as rail operations evolve, will offer additional opportunities to revitalize the River while enhancing flood protection. Restoration along the Rio Hondo can offer flood risk mitigation for the lower reaches, reducing design flood flows and facilitating reconfiguration of portions of the channel and restoration of habitat. If one looks only at the four final alternatives identified in the ARBOR study, Alternative 20 may look large. If one looks at the magnitude of the task of revitalizing the River, it looks small.

3

**Habitat Restoration and Connectivity**

Both the Common Ground open space plan of 2001 and the Los Angeles River Revitalization Master Plan of 2007 call for continuous greenways and habitat connectivity along the River. While achieving this goal will require major investments over a long period of time, the ARBOR study and the implementation projects that will follow it represent the most significant opportunity to begin restoring habitat. Alternative 20 proposes more and larger habitat areas as compared with Alternative 13, and Alternative 20 includes restoration at the confluence of Verdugo Wash, which will enable valuable connectivity from the Verdugo Hills to Griffith Park.

4

**Consistency with Local Plans**

The Los Angeles County 1996 Los Angeles River Master Plan identifies the confluence with each tributary as a special site and calls for open spaces at each. The City of Los Angeles 2007 Los Angeles River Revitalization Master Plan calls for a continuous greenway along the entire River, as did the Common Ground open space plan of 2001. Only Alternative 20 addresses all the confluences within the study area and the extent of greenways adequately.

5

The 2004 Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, published by Los Angeles County and subsequently adopted by the City of Los Angeles, identifies a "short list" of 59 indigenous native plants for use along the River corridor and identifies native plant communities for consideration in adjacent restoration areas and other open spaces. The plant lists in the Design appendix of the draft report, while including some of the same species, do not appear consistent with Landscaping Guidelines document.

6

I strongly support Alternative 20, and I urge the Corps to reconsider its recommendation of Alternative 13.

7

Sincerely,



Arthur Golding AIA LEED AP

ARTHUR GOLDING AND ASSOCIATES

ARCHITECTS URBAN DESIGNERS

---

### **Arthur Golding AIA LEED AP**

Arthur Golding first became involved with issues concerning the Los Angeles River in 1988, as part of a LA City Planning Department design charette for the City North area between Chinatown and Union Station. Working with other river advocates, he subsequently organized charettes for both the Taylor Yard and the Cornfields sites, involving dozens of design professionals. He was a founding board member of the Council for Watershed Health (nee Los Angeles and San Gabriel Rivers Watershed Council) and has served on the board continuously since 1996. He was a member of the planning team for the Common Ground: From the Mountains to the Sea open space plan for the double watershed of the Los Angeles and San Gabriel Rivers (2001), for the first Arroyo Seco Restoration Feasibility Study (2002), and for the Ballona Creek Watershed Management Plan (2003). He served as a member of the advisory group for the Los Angeles County Los Angeles River Master Plan of 1996, both during the planning phase and afterward. He served as a peer reviewer for the City of Los Angeles 2007 Los Angeles River Revitalization Master Plan. He has taught urban design studios focused on the Los Angeles River at the USC School of Architecture.

November 12, 2013

Josephine Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

Arup is the creative force at the heart of many of the world's most prominent projects in the built environment and across industry. Founded in 1946 with an enduring set of values, our unique trust ownership fosters a distinctive culture and an intellectual independence that encourages socially and environmentally conscious project decision making. Arup has been contributing to the Southern California community since 1986 and sustains a mission to *Shape a Better World*.

On behalf of Arup, and as a recent resident of California, I pledge our support for Alternative 20 of the US Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (Study) because it offers the greatest potential for catalyzing long-lasting benefits to our people and our local, regional, and national economies.

The Study area focus on a key 11-mile stretch of the 51-mile river near Downtown LA, which includes some of the region's most historically-underserved neighborhoods, will magnify investments already being made and attract future partnerships like never before. Our organization has seen how investments in infrastructure rooted in social wellness, like the New York City High Line Park, can have compounding benefits from future private investment and we believe this project offers the same benefits.

USACE has built a remarkable flood protection system that includes the LA River, but the environmental damage and community blight resulting from the river's channelization have become obvious. While the mission of the Study is ecosystem restoration and the USACE-preferred Alternative 13 minimally meets the Study objectives, Alternative 20 will clearly provide the most ecosystem restoration and will also provide *four times more jobs* and *three times more income* for only twice the investment as Alternative 13. Alternative 20 would provide over 9,000 direct jobs and add more than \$1 billion direct dollars to the gross national product. Moreover, the Study estimates that, including effects from redevelopment, over 16,000 jobs and nearly \$5 billion will result. Alternative 20 also reflects a more equitable cost-sharing partnership—with the local sponsor paying approximately 50% versus Alternative 13, which requires the local sponsor to pay almost 70%.

This Study has taken 7 years to complete—at a cost of nearly \$10 million—and its recommended project will take many more years to implement. However, we must now decide the extent of our commitment so that we may initiate the grassroots work it takes to achieve the most meaningful, expansive restoration in partnership with the federal government. We will not have another chance to make such a bold, sweeping statement in bringing nature back to our post-industrial landscape.

An investment in the Study is an investment in our people—our residents, our workers, our students, our businesses, our families, and the community institutions that serve them. Because of this, Arup supports Alternative 20 as the most appropriate plan. Fundamentally, we understand that transformation of the LA River will result in an improved regional quality-of-life and that its successes will be felt here and abroad for many years to come. Arup looks forward to being a partner in that transformation.

Sincerely,

Keith Greville, P.Eng (Ontario), C.Eng (Ireland)

Associate, Arup

12777 West Jefferson Boulevard, Building D,

Los Angeles, California 90066

[keith.greville@arup.com](mailto:keith.greville@arup.com)

Mobile – 206.228.7066





Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

November 18, 2013

Dear Dr. Axt:

I am the director of the Audubon Center at Debs Park. The Audubon Center at Debs Park, operated by the National Audubon Society, is an environmental education and conservation center serving the greater Los Angeles area, with a primary focus on the communities of Highland Park, El Sereno, Lincoln Heights, Hermon, Cypress Park and Boyle Heights. Our mission is to provide Angelenos with opportunities for people to experience, understand, and care for the natural world. At Audubon we believe that where birds thrive, people prosper. Through our 15 years of work in this region of Los Angeles, we know, first-hand, the need for enhanced habitat and passive recreational spaces in this part of town, particularly along the Los Angeles River. Nowhere is the opportunity greatest to create a better place for wildlife and people than the Los Angeles River.

I appreciate the time and effort the United State Corps of Engineers and City of Los Angeles have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, Audubon believes this alternative to lack the comprehensive approach to ecosystem restoration that would provide the best quality and quantity of riparian and wetland habitat, while increasing habitat connectivity, ecosystem function, and recreation in balance with conservation.

Audubon believes that Alternative 20 provides the best ecosystem restoration of globally rare habitats. By its scope alone, Alternative 20 provides much more alteration of existing conditions than Alternative 13. The length of area restored channel is 2 times greater, with more than 3 times the concrete removed, and creating 131 more acres of restored habitat. In areas where little habitat has remained, these increases are very meaningful for native wildlife species, including birds. Additionally, by restoring a higher quantity of habitat, there is a reduction in the distance between the habitat



nodes, which greatly enhances the effectiveness of the restoration, allowing for better movement between nodes.

Alternative 20 provides the best opportunities for connecting larger pieces of habitat within the Los Angeles River Watershed system. Inclusion of the Cornfields site and Verdugo Wash Confluence are vital corridors for the movement of both plants and animals. The Verdugo Wash Confluence connects the Verdugo Mountains with the Santa Monica Mountains and brings them together at the River. Already Los Angeles County Significant Ecological Areas, Griffith Park and the Verdugo Mountains will be greatly enhanced by this critical connection. Additionally, by including the Cornfields Site, further connections can be made between three of the City's largest urban, regional parks, Griffith Park, Elysian Park, and Debs Park. Debs Park along the Arroyo Seco is located only a few miles away from the confluence of the Arroyo Seco and the Los Angeles River, and provides connectivity to the Angeles National Forest, while Elysian and Griffith provides connectivity to the Santa Monica Mountains. These connections are critical for the health of the overall ecosystem.

From a hydrological perspective, we believe that the projects proposed in Alternative 20 are better for a variety of reasons. Firstly, these projects restore more hydrologic function by widening the main channel and tributaries at the Verdugo Wash confluence. Alternative 20 also widens the main channel in Glendale Narrows by converting trapezoidal walls to vertical on right bank, and terracing the left bank. Additionally, there is enhanced hydrological connectivity at the Cornfield and Piggyback Yard sites that are not achieved in any other presented Alternative. The wetlands associated with both the Piggyback Yard and Cornfields will also provide great opportunities for improved water quality and groundwater recharge.

Through all of the described improvements, Alternative 20 provides the most and best habitat restoration by enhancing actual riparian functions and habitat values. Specifically, the Piggyback Yard treatment in Alternative 20 includes the elevation of the railroad segment to increase hydrologic and wildlife connections. The Cornfields site includes higher value habitats by terracing the bank and creating freshwater marsh. Overall, we believe that Alternative 20 is more sustainable and resilient over Alternative 13 because of the increased habitat size, quality, and connectivity. Alternative 20 presents a scenario where birds, and other wildlife, will thrive.

The Los Angeles River runs through some of the most park-deficient and low income communities in the City. The restoration of the Los Angeles River will benefit the people of Los Angeles. At Audubon, we believe that all Angelenos deserve to have access to nature in their neighborhood. We know that a connection to the natural world is vital to physical health, through recreational opportunities and improved air quality, and mental wellbeing. There are also numerous schools located along the River that could use new outdoor spaces to make classroom learning come to life, particularly about



science. We know that this type of learning increases student productivity and improves test scores. All of these improved interactions also lead to greater civic engagement and lead to strong community connections. Alternative 20 provides the most possibilities for improved quality of life. Additionally, Alternative 20 by far provides the strongest economic improvements for Los Angeles, by increasing job opportunities. Alternative 20 will help the people of Los Angeles prosper, physically, mentally, and economically.

Although we strongly support Alternative 20, for any restoration scenarios and projects we offer this suggestion. Audubon has recognized 1,000 acres of Lower Los Angeles River, downstream from the ARBOR Study area, as an *Important Bird Area*. The Important Bird Areas Program, administered by the National Audubon Society in the United States, is part of an international effort to designate and support conservation efforts at sites that provide significant breeding, wintering, or migratory habitats for specific species or concentrations of birds. Sites are designated based on specific and standardized criteria and supporting data.


2

This 7-mile stretch of concrete channel along the LA River through north Long Beach, Compton and Paramount is one of the most important shorebird stopover sites in southern California.

Surveys conducted in 1999 and 2000 documented been 8000-15,000 birds per day between July and October, peaking in August and early September. NOTHING that is done upstream in the river should be allowed to compromise this critically important shorebird habitat that functions only because the water flow in the channel is not too much and not too little.

Restoration of the Los Angeles River is important for both the people and wildlife of Los Angeles! The communities that are found along the Los Angeles River, and the population, as a whole, deserve places that connect them with nature. We believe that Alternative 20 provides the best opportunity to restore this amazing urban ecosystem, leading to increased vitality of our communities. We urge the Corps and City to select Alternative 20 because it provides the best opportunity to re-envision our City and the nature found within.

Sincerely,



Jeff Chapman

Center Director, Southern California Conservation Leader  
Audubon Center at Debs Park

**From:** [Dan-Big Brand Water](#)  
**To:** [Bergmann, Kathleen M SPL](#)  
**Cc:** [Jones, Erin L SPL](#); [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Wednesday, September 25, 2013 1:06:00 AM

---

I am reviewing your publication entitled NLH Draft IFR for LA River Eco. Rest. Study that was posted on 9/13/2013.

My concerns with the project are improved water quality in the discharge water that reaches the oceans.

I have been selling water treatment equipment for about 20 years. The US ACE has been a valued customer of mine for many years.

My understanding is that there are four different alternatives being evaluated.

I am trying to understand from the documents here

<http://www.spl.usace.army.mil/Media/PublicNotices/tabid/1320/Article/17994/spl-2013-003-nlh-draft-ifr-for-la-river-eco-rest-study.aspx>

How each of the alternatives will improve water quality.

The report outlines the various sources of contaminants such as TSS (total suspended solids), PCE, TCE, selenium, pesticides, etc. in section 3.4.3.

I see constructions impacts on air quality outlined in the report.

Maybe I have overlooked key sections of the report. What I am trying to glean from the data provided is how each of the four methods plans to treat the contaminants in the water. The treatment technologies that will be used, and if we will be taking some or all of the urban runoff and putting them through some sort of purification process in both low flow and storm conditions. How much we project levels of these EPA regulated contaminants will be reduced in both low flow normal daily situations and in high flow storm situations.

Regards  
Dan Saltsburg  
Big Brand Water Filter, Inc.  
2088 Anchor Court #B  
Newbury Park, CA 91320  
(888) 426-9488 ext. 101  
(805) 480-1900 ext. 101  
<http://www.bigbrandwater.com>



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**From:** [DODSON, SNOWDY D](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] CNPS LA/SMM Chapter LA River Plan Comments  
**Date:** Monday, November 11, 2013 2:22:34 PM

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Nov. 11, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

I am writing on behalf of the California Native Plant Society (CNPS), Los Angeles/Santa Monica Mountains Chapter to urge support for Alternative 20 outlined in the Army Corps of Engineers' Los Angeles River Ecosystem Restoration Feasibility Study which will determine the long term fate of restoration activity along an 11 mile stretch of the River from Forest Lawn through the Glendale Narrows and into downtown. Although several of the alternatives would widen the channel and increase habitat, we feel that number 20 will go for the gold and do the project to the fullest extent by connecting the River to the Los Angeles State Historic Park (aka the Cornfields) as well as to the Piggyback rail yard in Lincoln Heights and to the Verdugo Wash near Glendale. This will allow for not only more open space for human use but also provide for an expanded natural wildlife corridor and restored wetlands. Alternative 20 would provide the River area with the greatest amount of restored habitat resulting in the largest number and variety of native plants and also the most extensive removal of non-native plant species.

The California Native Plant Society (CNPS) is a non-profit organization of over 9,000 laypersons and professional botanists with 33 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them and their natural habitats through education, science, advocacy, horticulture and stewardship. The restoration of the Los Angeles River to a less degraded and more natural condition so that it has a large variety of native plants together with non-native species removal is a project that we have been involved in for many years. This opportunity to revitalize the River to the fullest extent will come around once, and we know that Alternative 20 will give the River the best possible chance at being a more functioning ecosystem.

Sincerely

Snowdy Dodson, Chapter President  
[Snowdy.dodson@csun.edu](mailto:Snowdy.dodson@csun.edu) 818-782-9346

November 18, 2013

Josephine Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

Established in 1924, the Central City Association (CCA) is Los Angeles' premier business advocacy association whose 450 members employ over 350,000 people in the Los Angeles region. On behalf of our members, I would like to express our support for Alternative 20 of the U.S. Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (Study). This proposal offers the greatest potential for catalyzing long-lasting benefits to our residents as well as our local, regional, and national economies.

The project will restore hundreds of acres of habitat along an 11-mile stretch of river near Downtown Los Angeles. Alternative 20 envisions the most expansive ecosystem restoration of the L.A. River, and provides the greatest potential for economic development in the study area. It will create *four times more jobs* and *three times more income* for only twice the investment as Alternative 13, provide over 9,000 direct jobs, and add more than \$1 billion of direct dollars to the gross national product. After taking into account the redevelopment of surrounding neighborhoods such as Downtown, it is estimated that over 16,000 jobs and nearly \$5 billion in positive economic impact will result.

Furthermore, with Downtown Los Angeles in the midst of its own economic and cultural revitalization, this proposal will help solidify our city center into a regional destination for recreation and tourism. Alternative 20 is a more comprehensive program to integrate the waterway into city life, and will improve our quality of life by providing our growing residential community with more usable green space and parkways.

We look forward to partnering with you in the transformation of the L.A. River, and urge you to move Alternative 20 forward. Thank you for your consideration.

Sincerely,

Carol E. Schatz  
President & CEO

TELEPHONE: (310) 798-2400  
FACSIMILE: (310) 798-2402

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[DPC@CBCEARTHLAW.COM](mailto:DPC@CBCEARTHLAW.COM)

November 18, 2013

*Via E-mail* ([comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil))

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Re: Support for Alternative 20 of the Draft Los Angeles River Ecosystem  
Restoration Feasibility Report

Dear Ms. Axt:

We provide these comments on the Draft Integrated Feasibility Report ("Feasibility Report"), which includes a Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Los Angeles River Ecosystem Restoration Study.

Over many years, we have worked with various groups such as the Friends of the Los Angeles River, The River Project, and the Natural Resources Defense Council to revitalize and protect the Los Angeles River through inclusive planning, education and wise stewardship. We have helped them in their efforts to protect the few remaining natural portions of the Los Angeles River and to restore and enhance the remainder of the River and adjoining properties, while providing increased flood protection. Separately, we have joined these groups and others in a comment letter submitted today in support of choosing Alternative 20 in the Draft Integrated Feasibility Report.

We also join Mayor Garcetti and the Los Angeles City Council, along with the written comments submitted by Heal the Bay, the Trust for Public Land, the National Wildlife Federation, and Friends of Griffith Park, in support of Alternative 20. In considering the alternatives proposed, one must focus on the purpose of the Project:

The primary purpose of the proposed project and alternatives considered in this Study is to restore approximately 11 miles of the Los Angeles River from Griffith Park to Downtown Los Angeles by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries, its historic floodplain, and the regional



U.S. Army Corps of Engineers  
November 18, 2013  
Page 2 of 2

habitat zones of the Santa Monica, San Gabriel, and Verdugo mountain ranges while maintaining existing levels of flood risk management. A secondary purpose is to provide recreational opportunities consistent with the restored ecosystem.

(Feasibility Report, p. 1-1.)

Unfortunately, Alternative 13, which has been identified in the Feasibility Report as the Tentatively Selected Plan, fails to provide adequate ecosystem restoration of the Los Angeles River. Alternative 13 does not restore vital wildlife corridors, as it does not provide a connection for wildlife between the Santa Monica Mountains, the Verdugo Mountains, and the San Gabriel Mountains.

Additionally, Alternative 13 fails to promote environmental justice for underserved communities in Los Angeles, as it does not bring open, green space to these neighborhoods. Alternative 20, on the other hand, would provide a hydrological link to the Los Angeles State Historic Park, and connect this park and the river with wetlands and habitat.

While the purpose of the Project is to restore 11 miles of the Los Angeles River, the Feasibility Report does not propose measures to address water quality. The Feasibility Report specifically states, "This project is not proposing measures to address water quality; any improvements will be ancillary to the project." (Feasibility Report, p. 2-20.)

## Conclusion

We urge the U.S. Army Corps of Engineers to carefully reconsider its tentative selection of Alternative 13 and instead choose Alternative 20.

Pursuant to Public Resources Code Section 21092.2, we hereby request notification, by mail or e-mail, of any notices regarding this Project. Thank you for your time and consideration in this matter.

Sincerely,



Josh Chatten-Brown  
Douglas P. Carstens

**From:** [Rick Eng](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments on Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report  
**Date:** Monday, November 18, 2013 11:11:19 PM

---

To: Josephine R. Axt, Ph.D., Chief, Planning Division, U.S. Army Corps of Engineers, Los Angeles District

Dear Dr. Axt:

Water is the source of life on Earth and rivers have made vital contributions to the growth and evolution of human communities as well as provide sustenance for the planet's ecosystems.

Since 1912, the Los Angeles Lodge of the Chinese American Citizens Alliance (C.A.C.A.), the nation's oldest civil rights and social advocacy organization serving Chinese American communities, has taken strong interest in the health and well-being of one of the world's most diverse and dynamic cities.

C.A.C.A. Los Angeles strongly supports the revitalization of Los Angeles River as envisioned through the U.S. Army Corps of Engineer's Alternative 20—the reintroduction of the 51-mile-long river into the fabric of the city as a cohesive presence that strengthens balance and expresses harmony between its natural and urban environments.

C.A.C.A. joins myriad environmental and community organizations, municipal agencies and civic leaders in support of the most complete revitalization of the Los Angeles River and the best hope for the people of Los Angeles and its environs. Alternative 20 includes measures in all eight reaches with channel widening at Verdugo Wash, Arroyo Seco, Cornfield/LA State Historic Park, and Piggyback Yard. Supporting the most robust river restoration proposal will ensure that conservation efforts can produce a viable water supply safe for recreational uses and consumption.

Returning the river to the Cornfield/LA State Historic Park holds significant importance for C.A.C.A. Los Angeles Lodge because it was one of the major groups to spearhead the efforts to preserve 32 acres of open space from commercial development for public enjoyment.

Historically, rivers and waterways elevated many of the world's great cities to economic and political prominence. The Seine and Paris, Thames and London and the Potomac and Washington, D.C. come to mind. C.A.C.A. Los Angeles hopes the revitalization project will help earn Los Angeles and its river similar deserved recognition.

The Los Angeles River restoration through Alternative 20 is major undertaking which we believe is worthy investment for the City of Los Angeles and its future generations of human and inhabitants.

Thank you for your attention.

Sincerely,

Rick Eng  
Secretary

Chinese American Citizens Alliance (C.A.C.A.) Los Angeles Lodge  
website: [www.cacala.org](http://www.cacala.org)

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Rick Eng  
email: [rickeng562@gmail.com](mailto:rickeng562@gmail.com)

November 15<sup>th</sup>, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt:

I am writing on behalf of Community Conservation Solutions (CCS) to urge your selection of Alternative 20 from the choices presented in the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report. CCS is a conservation organization dedicated to solving the complex challenges that occur where people and nature intersect. I led the acquisition and conversion to park space of the very first parcels of land along the L.A. River beginning in 1994, and CCS has a deep interest in the overall revitalization of the L.A. River.

We are particularly focused on the integrated goals of restoration of native habitat along the L.A. River, establishment of a connected trail system, and creation of easily accessible, regional public access to the river. Alternative 20 best achieves all of these goals, and best reflects the creative vision we in Los Angeles County have for the L.A. River. Your recommendation of Alternative 13 does not.

Alternative 20 is the best choice because it emphasizes "smart" green Best Management Practices, best reflects ecosystem restoration and re-creation based on historic habitats and would provide far greater amounts of restoration area as Alternative 13. Alternative 20 is also the best choice because it:

- Emphasizes connectivity between the L.A. River, Elysian Park, the Verdugo Wash, the Verdugo Mountains and the San Gabriel Mountains
- Includes Piggyback Yard, which will create wetlands, increase hydrologic and wildlife connections, and is truly restoration in the highest sense of that term
- Emphasizes restoration of the Cornfields site with badly-needed higher-value native habitats
- Would provide twice as much linear length of revitalized river, with a total of 6.4 miles
- Creates 131 more acres of restored habitat than Alternative 13
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives

We urge the Army Corps to select Alternative 20 as the final choice, because it provides the highest restoration value for the L.A. River and in an ecosystem-based way, best serves the communities of Los Angeles County, and best reflects long-term sustainability goals.

Sincerely,

Esther Feldman  
President  
Community Conservation Solutions



## Council for Watershed Health

November 16, 2013

Dr. Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

ATTN: Ms. Erin Jones, CESPL-PD-RN

SUBJECT: Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report

Dear Dr. Axt,

On behalf of Council for Watershed Health, I am pleased to submit our comments on the SPL-2013-003-NLH-Draft IFR for LA River Ecosystem Restoration Report dated September 2013. The Report is a much-needed analysis of ecosystem restoration for our iconic Los Angeles River. The Council is grateful to the United States Army Corps of Engineers for the time and consideration evidenced in the comprehensive Report.

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At its September 26, 2013, meeting of the board of directors, Council for Watershed Health took a formal position in support of Alternative 20. Alternative 20 provides the maximal benefits and opportunities for ecosystem restoration for the Los Angeles River Watershed and we respectfully request the adoption by the federal government of this as the preferred Alternative.

Our knowledge of the aquatic and riparian habitat in the Los Angeles River Watershed is gained through our management, since 2007, of the Los Angeles River Watershed Monitoring Program. The program provides managers and the public with a more complete picture of conditions and trends in the Los Angeles River watershed. The objectives are to develop a watershed scale understanding of the status of surface waters and improve the coordination and integration of monitoring efforts for both regulatory compliance and ambient watershed condition.

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Although monitoring results are reported annually, in 2013 the Council completed a comprehensive report of the first five years of monitoring. The Executive Summary highlights



several findings.<sup>1</sup> Relevant to the US Army Corps of Engineers Report, we found that biological communities in concrete-lined channels are highly degraded relative to the more natural sites in the upper watershed, also notably at the confluence points that are called out by the program as sites of significant interest. Importantly, the presence and condition of the surrounding riparian habitat was a stronger influence on river condition than water chemistry or toxicity. Thus, a comprehensive revitalization plan that includes maximal additional riparian habitat area, specifically at the confluences, is strongly supported. Increase in riparian area will have significant positive impact on the proximate aquatic habitats, multiplying the ecosystem benefit of the restoration.

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In addition, water quality is one of many benefits that should be considered when restoring ecosystems. Alternative 20 outperforms Alternative 13 by virtue of its greater acreage of wetland marsh that would provide a cleansing effect on stormwater flow. Alternative 20 provides almost 50% more acreage of freshwater marsh habitat, and would therefore be more effective in helping to meet TMDL wet-weather targets especially for heavy metals (copper, lead, and zinc) and bacteria.

3

Following are some additional comments in support of our position. The Council looks forward to a Final Report that recommends Alternative 20 and, ultimately, to implementation of this very important ecosystem restoration project that will benefit the ecosystems and people of Los Angeles.

Sincerely,



Nancy L.C. Steele, D.Env.  
Executive Director

<sup>1</sup> [http://watershedhealth.org/Files/document/839\\_LARWMP\\_Four-page%20Summary\\_web.pdf](http://watershedhealth.org/Files/document/839_LARWMP_Four-page%20Summary_web.pdf)

### Specific Comments and Supporting Information:

I. Watershed-specific restoration and biological benefits: As stated in the Habitat Evaluation, Appendix G<sup>2</sup>, “Restored ecosystems should mimic, as closely as possible, conditions that would occur in the area in the absence of human changes to the landscape and hydrology. Indicators of successful restoration include the presence of a large variety of native plants and wildlife, the ability of the area to sustain larger numbers of key indicator species or more biologically desirable species, and the ability of the restored area to continue to function and produce the desired habitat benefits with a minimum of continuing human intervention.” We concur with this characterization and urge the US Army Corps of Engineers to take necessary steps toward this goal:

A. A multiyear effort to control highly invasive plants (e.g. *Arundo donax*, *Washingtonia filifera*, and *Pennisetum setaceum*) will be required to meet habitat restoration goals. Because there are significant infestations of invasive plants in the restoration area as well as upstream from the restoration area and because seed and rhizomes of these plants move downstream in heavy flows, attempts to establish native plants to meet the ecosystem restoration goals will fail if an invasive control program is not in place. Mapping, control, and monitoring should occur in both the Report area and infested headwater areas, and should occur prior, during, and post project development.

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B. The listed Wetland and Riparian and Buffer/Transitional plants (Design: Appendix A<sup>3</sup>) do not thoroughly reflect the native plant communities that would have “occurred in the area in the absence of human changes.” As approved by the City of Los Angeles and referenced in the *Los Angeles River Revitalization Master Plan*<sup>4</sup>, the *Los Angeles River Master Plan Landscape Guidelines and Plant Palettes*<sup>5</sup> details the watershed specific plant species that are native to this watershed. These vetted lists of native plants appropriate for habitat restoration are based on plant material records accessioned in herbaria. We request that the plant lists be modified to include species identified in the *Los Angeles River Master Plan Landscape Guidelines and Plant Palettes*.

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C. The Council urges the US Army Corps of Engineers to require the use of plant material propagated from local historic populations (ecotypes), in particular because of the adjacency of the Report to Significant Ecological Areas, as identified by Los Angeles County. This best practice protects existing native plant populations from outbreeding depression by preserving

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<sup>2</sup> Draft Habitat Evaluation Appendix G, page 10

<sup>3</sup> Draft Design Appendix A. Table 3.1 and 3.2

<sup>4</sup> City of Los Angeles, *Los Angeles River Revitalization Master Plan*, April 2007.

<sup>5</sup> Los Angeles County Department of Public Works. *Los Angeles River Master Plan Landscape Guidelines and Plant Palettes*. 2004.

genetic integrity. The Society for Ecological Restoration *Guidelines for Developing and Managing Ecological Restoration Projects*<sup>6</sup> states,

“Care should be taken to ensure that regional ecotypes of biotic resources are obtained to increase the chances for genetic fitness and to prevent introduction of poorly adapted ecotypes.”

The US Forest Service and the Genetic Resources Conservation Program at UC Davis have developed guidelines for selecting genetically appropriate plants for restoration projects.<sup>7</sup> Further justification for local requiring local ecotypes is outlined in a US Department of Agriculture Forest Service paper entitled *Is Genetic Management Important in Urban Landscapes?*<sup>8</sup> This document states that, “many animal species are sensitive to not only the species of plants that they use for food or other purposes, but to specific qualities of certain populations... some animals are selecting, and perhaps are co-adapted with, genetically based features of the plant species – features that vary across a natural range.” Requiring local ecotypes is referenced in Section 7.0 of *Los Angeles River Master Plan Landscape Guidelines and Plant Palettes* and should be made explicit in the final Repot.

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D. Council for Watershed Health leads the *Native Seed Resources Coalition*, which in March 2012 initiated an effort to strengthen the reliable supply of locally native plants for restoration and public landscaping projects in Southern California, especially the Los Angeles River. The Coalition comprises ecologists, horticulturists, land managers, landscape architects, engineers, planners, seed collectors, and native plant nurseries that are working to increase availability of watershed-specific native plants. We encourage the US Army Corps of Engineers to participate in this Coalition in order to learn from practitioners in the field and participate in proposing improved policies for the Los Angeles River Watershed.

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II. Regional Economic Development benefits. We understand that Regional Economic Development (RED) benefits are often examined in less detail for most water resources planning projects than National Economic Development (NED) benefits or National Ecosystem Restoration (NER) benefits. However, a more recent Corps narrative and indeed one of the objectives for revising the Principles & Guidelines is for greater emphasis on non-traditional factors in the planning of water resources projects, with greater consideration for the environment, social effects, and public safety by using “assessment methods that reflect the

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<sup>6</sup> Society for Ecological Restoration. *Guidelines for Developing and Managing Ecological Restoration Project*, 2<sup>nd</sup> Edition. December 2005.

<sup>7</sup>Montalvo, Arlee M., Rogers, Deborah L., *Genetically Appropriate Choices for Plant Materials to Maintain Biological Diversity*. December 31, 2004.

<sup>8</sup> United States Department of Agriculture, 2006. *Is Genetic Management Important in Urban Landscapes?* [http://www.fs.fed.us/wildflowers/nativeplantmaterials/documents/genetics\\_Vol\\_12.pdf](http://www.fs.fed.us/wildflowers/nativeplantmaterials/documents/genetics_Vol_12.pdf)

value of projects for low-income communities.”<sup>9</sup> Indeed, a US Army Corps of Engineers Engineering Circular, EC 1105-2-409, “Planning in a Collaborative Environment,” places a much greater emphasis on the broad range of considerations in planning besides the NED effects,<sup>10</sup> and, ostensibly, besides the NER effects. To this end, the results of the RED analysis are included in the Report but don’t seem to be used in the decision of a Tentatively Selected Plan (TSP). The RED comparisons between Alternative 13 and Alternative 20 are actually staggering (all figures approximate, drawn from Table 8-49 of Appendix B of the Report):

- a. In the category of construction impacts related to ecosystem features, there is an approximate increase of 450%: in Jobs from 2,000 to 9,000, in Labor Income from \$114M to \$518M, in Sales from \$274M to \$1.2B, and in the Gross Regional Product from \$160M to \$724M.
- b. In the category of construction impacts related to redevelopment, there is an approximate increase of 400%: in Jobs from 1,280 to 5,100, in Labor Income from \$85M to \$336M, in Value from \$116M to \$460M, and in Output from \$193M to \$767M.
- c. In the category of long-term economic impacts related to redevelopment, there is an approximate increase of 400%: in Jobs from 675 to 2,675, in Labor Income from \$965M to \$3.8B, and in Local Taxes from \$5.8M to \$23M.

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In today’s economy, with the Administration calling for increased spending on infrastructure because it “creates jobs, it puts people to work,”<sup>11</sup> this differentiation in RED benefits among the alternatives must not be ignored.

III. Other Social Effects benefits. EC 1105-2-409, “Planning in a Collaborative Environment,” mentioned above, also puts a greater emphasis on the importance of social factors in plan selection. The Draft Report contains a paragraph indicative of the importance of the Other Social Effects (OSE) account:

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“Social effects in a general sense refer to a concern for how the constituents of life that influence personal and group definitions of satisfaction, well-being, and happiness are

<sup>9</sup> US Army Corps of Engineers, 2011. *Regional Economic Development (RED) Procedures Handbook*. Institute of Water Resources Report 2011-RPT-01. March, 2011.

<sup>10</sup> Ibid.

<sup>11</sup> New York Times, 2013. “Obama, Under Health Law Cloud, Hits Road to Push New Public Works.” Article by Campbell Robertson, published November 8, 2013.

[http://www.nytimes.com/2013/11/09/us/politics/obama.html?\\_r=0](http://www.nytimes.com/2013/11/09/us/politics/obama.html?_r=0)



affected by some condition or proposed intervention. Well-being is an ensemble concept composed of multiple dimensions. While economic factors are very important in characterizing well-being there are many more factors which come into play. In particular the distribution of resources; the character and richness of personal and community associations; the social vulnerability and resilience of individuals, groups, and communities; and the ability to participate in systems of governance are all elements that help define well-being.”<sup>12</sup>

Per the Corps of Engineers’ guidance in applying OSE analyses to plan selection,<sup>13</sup> the Draft Report also contains numerous examples where these social effects—health and safety, economic vitality, social connectedness, community identity, community participation, and recreational activities—are improved across the array of alternatives. Admittedly more difficult to model quantitatively, this Report nevertheless includes a myriad of examples and investigative data supporting the connection and relevance of habitat, environmental health, and recreation to the very factors considered in an OSE analysis. It is clearly stated that the scale of the respective alternatives supports the differentiation between them. And so, the increases in economic development, mentioned above, as well as an increase of 22% in the amount of habitat alone from Alternative 13 to Alternative 20, provides support for determining that Alternative 20 would result in the greatest increase in OSE benefits.

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IV. Use of IWR-Plan as a sole indicator of economic benefits. Alternative 20 is a “Best Buy,” according to the IWR-Plan terminology. The additional cost of Alternative 20 over Alternative 13, however, still produces a valid return on the investment albeit with diminishing returns. This is typical of incremental analyses, of course, but doesn’t mean that Alternatives 16 or 20 are not cost effective. We would expect that even if only IWR-Plan were used as a criterion for decision-making, as it appears to have been, the additional value of larger alternatives that were still cost-effective would provide justification for their selection. Through review of the alternative matrix and additional plan formulation information in the Report, there were numerous other “Best Buy” and cost effective alternatives that were identified, e.g., tunneling and underground storage, but that were discounted due to reasons including cost considerations. Because of this, Alternative 20 does not truly rank as “the most expensive alternative” and should not be viewed as such.

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V. Specific recommended technologies. We are concerned with call-outs for the use of specific technologies, which may be supplanted by competing or improved technologies in the future. We recommend the Final Report identify the recommended outcome and allow specific

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<sup>12</sup> Draft Economic Appendix B, page 93.  
<sup>13</sup> US Army Corps of Engineers, 2013. *Applying Other Social Effects in Alternative Analysis*. Institute for Water Resources, Report 2013-R-03. April 2013.

technologies to be selected as part of the design process. As an example, the Report recommends the use of turf reinforcement mats (TRM) or other permanent non-biodegradable geotextile fabrics in habitat restoration projects. Where we have seen these used in non-turf environments, the plastic netting often becomes exposed when mulch and topsoils degrade. They are unsightly, easy to trip on, and birds, small mammals often get snagged and die in the material. Temporary biodegradable rolled erosion control products provide significant benefits without the potential cost to aesthetics, public safety, or wildlife and provide the necessary erosion control while deep-rooted native plants are established.

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Erin Jones  
Biologist  
U.S. Army Corps of Engineers  
Los Angeles District  
[erin.l.jones@usace.army.mil](mailto:erin.l.jones@usace.army.mil)

Dear Ms. Jones,

The Joint River Oversight Committee, a standing committee of both Boyle Heights and Downtown LA neighborhood councils, held an open public meeting Mon Oct 28, 2013. The two neighborhood councils represent both sides of Downtown LA and the accompanying bridges.

The four main proposals from the 500 page Draft IFR were presented to the public in a manner similar to your multimedia presentation on Oct 17 at FOLAR. We showed the Southern California ecosystem and explained the reasons you support Alt 13 and the Mayor supports Alt 20.

Our committee collected public comments and a neighborhood "vote". Here are our findings for your review:

1) After seeing the complexity of the review materials, the public felt that the comment period is prohibitively short and did not allow for a proper assessment of the 4 plans. Therefore, we agreed to focus on Alt 13 and Alt 20. 1

2) We noted that Alt 13 does not come to Downtown LA; therefore there would be no direct impact on our area. We noted that the 6th street Bridge project is a companion federal project, and will have GREAT impact on this area-- therefore we noted there is a troubling disconnect between Alt 13 and the "local" River (bridge) project. Even Alt 20 barely addresses Downtown LA's complex situation. 2

4) We noted that Alt 20 is the only plan which ties together a true, connected ecological restoration of the Southland AND the remarkable social capital and 2nd hand benefits of increased tourism and media activity along the proposed restored areas. We also noted that "social capital" was NOT listed as an ecological benefit, meaning your graphs and cost breakdowns were unintentionally weighted *against* it and therefore inaccurate.

5) We noted that the matching funds in the larger proposal correspond more closely with the typical 50-50 fed/local splits that happen in other projects of this type. That said funding will take place over time, giving LA and Federal Government opportunities to "grow back" the money and make this a true infrastructure investment.

6) The committee also was in unanimity that the consensus to support the broader Alternative 20 best represented all communities and the political leadership and environmental groups. 3

7) We also discussed that Alternative 20 is the only proposal that would enhance the ties between the river and Los Angeles State Historic Park by creating wetlands and a marsh that connect the river to the park.

8) After reviewing the materials, we voted in favor of supporting Alt 20. We feel that Downtown LA, and the entire Southern California area, would benefit from the increased flood control and wildlife activity. This is in addition to the social capital that would indirectly be accrued.

With this in mind, the Downtown LA Neighborhood Council Board and the Boyle Heights Neighborhood Council Board jointly support the Mayor's office, and River Proposal Alternative 20.

This letter was approved by the DLANC Board of Directors on November 12, 2013.

Thank you for your time.

Patti Berman  
President  
DLANC

Joint River Oversight Committee  
Geza Gedeon, Chair

November 17, 2013

Dr. Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325Dr.

ATTN: Ms. Erin Jones, CESPL-PD-RN

SUBJECT: Request to Select Alternative 20 in the Draft Los Angeles River Ecosystem Restoration Feasibility Report

Dear Dr. Axt:

Thank you for your tremendous effort over the past several years in bringing the subject report to fruition. The importance of the restoration of the ecosystem of the Los Angeles River cannot be overestimated, for the region, or the nation. This river feeds and drains the most populous county in the United States. Over 10 million people who are a part of this ecosystem will benefit from the vision your plan clearly defines.

I believe the report should be concluding with a selection of Alternative 20 as the recommended alternative. It appears the recommendation for Alternative 13 is completely based on the economic analysis of costs per habitat unit. Throughout the report, tables and graphs indicate respective outputs as the planned features incrementally increase across the alternatives. I understand how the graphs show that the bulk of the habitat units—almost 6,000 average annual habitat units (AAHU)—are realized by \$21M in annual cost, and that less than 1,000 AAHU more would cost an additional \$30M in annual cost. I agree that—purely through the use of the incremental analysis tool, IWR-Plan—the larger alternatives appear to be less cost effective. However, I suggest the Corps of Engineers has not considered numerous other indicators in your decision-making as outlined below.

As the owner of a small business within Los Angeles, I strongly encourage you and your organization to reconsider your recommendations, and select Alternative 20, for the following reasons:

- 1) Regional Economic Development benefits. I understand that RED benefits are often examined in less detail for most water resources planning projects than National Economic Development (NED) benefits or National Ecosystem Restoration (NER) benefits. However more recent Corps narrative and indeed one of the objectives for revising the Principles & Guidelines is for greater emphasis on non-traditional factors in the planning of water resources projects, with greater consideration for the environment, social effects, and public safety by using “assessment methods that reflect the value of projects for low-income communities.”<sup>1</sup> Indeed, your own Engineering Circular, EC 1105-2-
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409, “Planning in a Collaborative Environment,” places a “much greater emphasis on the broad range of considerations in planning besides the National Economic Development (NED) effects,” and, ostensibly, besides the NER effects. To this end, the results of the RED analysis are included in the report but don’t seem to be used in the decision of a Tentatively Selected Plan (TSP). The RED comparisons between Alternative 13 and Alternative 20 are actually staggering (all figures approximate):

- a. In the category of construction impacts related to ecosystem features, an increase in Jobs from 2,000 to 9,000, in Labor Income from \$114M to \$518M, in Sales from \$274M to \$1.2B, and in the Gross Regional Product from \$160M to \$724M – all representing a 450% increase.
- b. In the category of construction impacts related to redevelopment, an increase in Jobs from 1,280 to 5,090, in Labor Income from \$85M to \$336M, in Value from \$116M to \$460M, and in Output from \$193M to \$767M – all representing an approximate 400% increase.
- c. In the category of long-term economic impacts related to redevelopment, an increase in Jobs from 2,670 to 675, in Labor Income from \$965M to \$3.8B, and in Local Taxes from \$5.8M to \$23M – all representing an approximate 400% increase.

In today’s economics, with ongoing discussion of additional stimulus authorities, and with the Administration calling for Increased spending on infrastructure because it “creates jobs, it puts people to work,”<sup>2</sup> this differentiation in RED benefits among the alternatives cannot be ignored.

- 2) Use of IWR-Plan as a sole indicator of economic benefits. All of the final array alternatives including Alternative 20 are indeed cost effective—“Best Buys,” in fact, according to the IWR-Plan terminology. So the additional cost over Alternative 13 still returns a valid return on the investment albeit with diminishing returns. This is typical of incremental analyses, of course, but doesn’t mean that Alternatives 16 or 20 are not cost effective. I would expect that even if only IWR-Plan were used as a criterion for decision-making, as it appears to have been, the additional value of larger alternatives that were still cost-effective would provide justification for their selection. Through review of the alternative matrix and additional plan formulation information in the report, there were numerous other “Best Buy” and cost effective alternatives that were identified, e.g., tunneling and underground storage, but that were discounted due to reasons including cost considerations. Because of this, Alternative 20 does not truly rank as “the most expensive alternative” and should not be viewed as such.
- 3) Other Social Effects benefits. EC 1105-2-409, “Planning in a Collaborative Environment,” mentioned above, also puts a greater emphasis on the importance of social factors in plan selection. The Draft report contains a paragraph exactly indicative of the importance of the Other Social Effects (OSE) account:

“Social effects in a general sense refer to a concern for how the constituents of life that influence personal and group definitions of satisfaction, well-being, and happiness are affected by some condition or proposed intervention. Well-being is an ensemble concept composed of multiple dimensions. While economic factors are very important in characterizing well-being there are many more factors which come into play. In particular the distribution of resources; the character and richness of personal and community associations; the social vulnerability and

resilience of individuals, groups, and communities; and the ability to participate in systems of governance are all elements that help define well-being.”

Per the Corps of Engineers’ guidance in applying OSE analyses to plan selection, the Draft Report also contains numerous examples where these social effects—health and safety, economic vitality, social connectedness, community identity, community participation, and recreational activities—are improved across the array of alternatives. Admittedly more difficult to model quantitatively, your report nevertheless includes a myriad of examples and investigative data supporting the connection and relevance of habitat, environmental health, and recreation to the very factors considered in an OSE analysis. It is clearly stated that the scale of the respective alternatives supports the differentiation between them. And so, the increases in economic development, mentioned above, as well as an increase of 22% in the amount of habitat alone from Alternative 13 to Alternative 20 provides support for determining that Alternative 20 would result in the greatest increase in OSE benefits.

- 4) Water Quality. While not a direct mission of the Corps, water quality is of course of concern. Here, again, Alternative 20 outperforms Alternative 13 by virtue of its greater acreage of wetland marsh that would provide a cleansing effect on surrounding stormwater flow. It provides almost 50% more acreage of freshwater marsh habitat, and is more effective in helping to meet TMDL wet-weather targets especially for heavy metals (copper, lead, and zinc) and bacteria. The percentage of constituent concentration reduction required to meet TMDL targets that is achieved by in-stream freshwater marsh habitat is expected to be approximately 75% higher in Alternative 20 compared to Alternative 13. This truly speaks to multi-objective planning.

Thank you very much for your consideration. I look forward to hearing of the final decision, and look forward to a change in the Tentatively Selected Plan to Alternative 20.

Sincerely,

*Michael Drennan*

Michael Drennan  
President  
Drennan Enterprises, Inc.

November 18, 2013

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Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District, P.O. Box 532711

**RE: Los Angeles River Ecosystem Restoration Study**

Dear Josephine R. Axt,

I am writing in regards to the *Draft Integrated Feasibility Report* for the *Los Angeles River Ecosystem Restoration Study* released on September 13, 2013. I have admittedly only glanced through the lengthy document so I do not have detailed comments related to specific content. Rather, I do have a few general comments I would like to submit.

The implementation of the selected design alternative should not preclude, impede, or in any way hinder the future purchase, donation or other acquisition of river-adjacent lands for purposes of floodplain expansion. While habitat restoration is admirable and of great importance, restoring watershed function is the more significant issue facing the Los Angeles region and, in addition to habitat restoration, includes increased flood protection, sediment transport, local water supply, etc., especially in the wake of future climate change. It is clear that the City is interested in encouraging development along the River corridor as mentioned in *Item 3.1.1* on *Page 11* of the *Draft Economic Appendix*. Given my concerns mentioned earlier in this paragraph, I would hope that the Corps might recommend against future development in the L.A. River floodplain, especially in currently "under-developed" areas adjacent to the channel, if not for the sake of flood protection alone.

Also of concern is public access to the River. While browsing through the document, I noticed a number of proposed channel wall modifications, particularly in the Elysian Valley reach. This area saw a very successful pilot season for kayaking this past Summer and any modifications that would preclude such access and recreation would ultimately be detrimental to ongoing restoration efforts and to the education of many future River enthusiasts.

Thank you very much for accepting my comments and I look forward to following the further development of this study.

Sincerely,



Joshua Link, Principal  
ASLA | LEED AP | PLA #5503

**Office:** (323) 739-6054  
**Mobile:** (626) 862-6774  
**Email:** j.link@ecotonestudios.com



ELYSIAN VALLEY ARTS COLLECTIVE

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November 17, 2013

Josephine R. Axt, Ph.D; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Attn: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[Comments.lariverstudy@usace.army.mil](mailto:Comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

I am writing to you as a 10-year resident of Elysian Valley, and as the President of the Board of Directors of the Elysian Valley Arts Collective (EVAC). I both live and work in Elysian Valley, one block from the Los Angeles River. I operate my architecture business, Tracy A. Stone Architect, at the corner of Knox and Blake Ave.

The EVAC is an educational and professional Association formed to promote the arts and the profession of those arts in Elysian Valley, CA.; to organize and manage the Frogtown Artwalk, a yearly self-guided tour of the artist/artisans' studios in Elysian Valley; to promote knowledge of, and to stimulate interest in and appreciation of, the creative arts in the community; and to encourage interest in the arts for our youth. The EVAC is comprised of over 50 individuals and businesses located in Elysian Valley. We identify strongly as a river-front community, and we work hard to raise awareness of the importance of the health of the river to our residents and businesses.

I appreciate the time and efforts the Corps and the City have expended to prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am so happy that the Corps and the City have worked with the community to restore the river.

The EVAC has reviewed the report, and we understand that each of the proposals under consideration have the same intent with respect to habitat restoration in our neighborhood. However, we are writing to express support for the Alternative 20 presented in the document. This alternative offers more comprehensive restoration that will benefit the river as a whole, and therefore ALL the neighborhoods bordering the river.

We believe that Alternative 20 is superior to Alternative 13 for the following reasons:

- Better connectivity for wildlife migration, seed dispersal and hydrology
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh





2041 BLAKE AVENUE, LOS ANGELES, CA 90039 323-664-0202 EIN: 35-234623 www.evartscollective.com

BOARD OF DIRECTORS

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- Cornfields provides connection to the Elysian Park
- Reduction of distances between habitat nodes
- It is more similar to the ecosystem that historically existed prior to the channel
- More concrete is removed
- More acres of restored habitat
- More likely to be sustainable and resilient over the life of the project
- Provides more jobs

Restoration of the Los Angeles River is crucial to us as a city, and to our neighborhood specifically. It will help to redress the intense destruction and overdevelopment in our city.

We urge the Corps and the City to select Alternative 20 because it provides the best restoration and the most sustainable project for the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Stone", is centered on a light yellow rectangular background.

Tracy Stone AIA LEED AP BD&C

President  
Elysian Valley Arts Collective



November 18, 2013

Josephine R. Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711, ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
Via email at [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Re: Comments on Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report

Dear Ms. Axt and Ms. Jones:

I am writing on behalf of Enterprise Community Partners to join our mayor, our political leaders, fellow members of the Federal Urban Waters Partnership, numerous other organizations, and fellow citizens to express our unified voice in advocating for the selection of Alternative 20 as presented in your draft feasibility report.

Enterprise Community Partners is a mission-driven nonprofit with more than 30 years of success investing in community development that achieves a sustainable balance between urban and natural systems, at the parcel level for real estate projects, but also more broadly at the scale of water resource protection, watershed health and the network of habitat corridors impacted by urban development. Our investments include a number of projects along the Los Angeles River and in the feasibility report study area, and we see first hand how a coordinated effort at restoration could integrate the river into existing green space, provide vital support for endangered species and ecosystems, and connect those of us who live and work nearby to a resource that uplifts and even heals Los Angeles' diverse community of human residents as well. By studying options for a much-needed upgrade of stormwater infrastructure, we also see a once in a lifetime opportunity to do more than address flood control and stormwater management. We have a chance to act comprehensively to restore the multitude of functions that healthy waterways can play in our urban areas. Today, because of the functional success of our current flood control system, the Los Angeles River acts to divide, isolate, and interrupt the natural flow and access to potentially abundant natural resources within the region. Upon reviewing your study, we believe that Alternative 20 is our best chance to change that.

While not the primary objective of restoration, we cannot deny the enduring economic and community benefits that Alternative 20 offers, both in terms of jobs, but also as an opportunity to redress some of the environmental and social injustices that have resulted from the paving of the river in the past. Alternative 20 will lift up both the natural habitat and people of Los Angeles, and we look forward to joining the Army Corps for once in a lifetime leadership in doing just that.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Schaffer", written over a circular stamp.

Jeff Schaffer  
Vice President

Southern California Market Leader

[ENTERPRISE COMMUNITY PARTNERS, INC.](http://www.EnterpriseCommunity.org)

600 Wilshire Boulevard ■ Suite 600 ■ Los Angeles, CA 90017 ■ 213.833.7988

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Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

November 15, 2013

Dear Dr. Axt:

I write on behalf of Environment Now (EN). EN is a family foundation based in Los Angeles since 1989 and dedicated to seeing measurable improvement in ecosystem protection and restoration. We have worked with partners for over twenty years to improve water quality in the LA River and to reduce our region's dependency on source waters. We have found that as Angelenos become more connected to their local waterways, they become more conscientious about where their water comes from and how to best conserve water. Additionally, our staff and partners enjoy the river as a recreational area, an urban wildlands attraction, as well as a reclamation and potentially water re-use channel. We are dedicated to creating a better balance of our environment and urban community.

EN appreciates the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. We are thrilled that the Corps and City have worked with local water advocates to be on the same side of the Los Angeles River Ecosystem Restoration! Our colleagues have reviewed the report in detail and developed comments, which we endorse in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, EN found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat

- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to EN and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,





November 7, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711,  
Los Angeles, CA 90053-2325  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

RE: Comment on Los Angeles River Ecosystem Restoration Feasibility Study

Dear Dr. Axt,

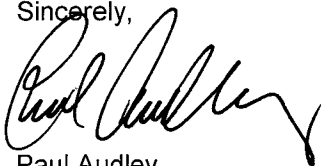
FilmL.A. is a private, 501(c)4 not-for-profit organization established for the public benefit. We coordinate and process permits for on-location motion picture, television and commercial production under contract to public-sector clients including the City of Los Angeles and the County of Los Angeles. FilmL.A. was created when the City and County of Los Angeles decided to privatize their film permit offices. FilmL.A. is funded primarily by permit coordination fees paid by production companies

The Los Angeles region is considered the entertainment production capital of the world. Much of the region's film production takes place not on a sound-stage, but rather in one of L.A.'s many diverse neighborhoods. Your agency knows, of course, that the Los Angeles River is a common shooting location.

FilmL.A. endorses Alternative 20 for the L.A. River Ecosystem Study as the most appropriate plan for the future of the Los Angeles River and consequentially, the economy of the region. We believe that habitat restoration and new and improved passive recreation areas will create many new locations to entice filmmakers, and that the resulting media images will have a positive effect of nurturing local environmental stewardship as well as boosting tourism to the region. Our own FilmL.A. employees have volunteered to pull trash at the annual river cleanup event for the past few years. Many of them live in the Los Angeles River watershed and feel passionately about improving it.

Recently, the beautiful, natural-bottom areas of the river have begun to appear in featured in films, television, and music videos. We encourage the choice of Alternative 20 to make the river a beautiful natural backdrop for increased on-location filming in Los Angeles, increased tourism, and improved public health for Angelenos.

Sincerely,



Paul Audley  
President



November 18, 2013

Josephine R. Axt, Ph.D.;  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt

On behalf of the Friends of the Los Angeles River (FoLAR), I am pleased to submit these comments on the Draft Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report ("Report").<sup>1</sup> We commend the Corps for preparation of this comprehensive and professional evaluation of the option for restoration of the Los Angeles River. The restoration will be a major step forward, not only for the river and its wildlife, but for the people of Los Angeles.

FoLAR has been advocating for river restoration for over 25 years. During this period FoLAR has conducted scientific studies, run an ongoing educational program for Los Angeles students focused on the river and its ecology, prepared and advocated plans for river-related improvements, and advocated for public use of the river, including obtaining of passage of state legislation assuring the public's right to use the river for recreation and educational purposes. Legislation. FoLAR has approximately 10,000 members, supporters and other associated individuals and groups with a strong interest in the Los Angeles River. Each year about 4,000 people participate in FoLAR's river cleanup, the *Gran Limpieza*.

To prepare comments we have drawn on this experience and expertise and that of other organizations with an interest in the river. To support our review we have also retained experts in wildlife and river policy, convened a group of scientists at the Los Angeles Natural History Museum, and worked with others with related expertise.

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<sup>1</sup> <http://www.spl.usace.army.mil/Media/PublicNotices/tabid/1320/Article/17994/spl-2013-003-nlh-draft-ifr-for-la-river-eco-rest-study.aspx>

While we appreciate the extensive effort which has gone into this report, we find that the Corps selection of Alternative 13 as the Tentatively Selected Plan falls far short of what is needed for adequate restoration of the river. As detailed in these comments, we believe the analysis and findings of the Report clearly support Alternative 20 rather than Alternative 13 as the Selected Plan. Alternative 13 lacks the comprehensive approach of Alternative 20, and falls short of meeting the Corps' own objectives for the restoration. In short, the Corps has selected a Preferred Alternative/Tentatively Selected Plan which fails to meet some of its own objectives and only marginally satisfies others.

These comments focus on two major, interrelated analytical problems with the conclusion reached in the Report that Alternative 13 adequately addresses the overall objectives of the Corps' study:

- The Corps has set numerical objective performance criteria for adequacy of the restoration which are artificially low compared with the stated objectives of the study. (Discussed in Section I of these comments)
- In rejecting Alternatives 16 and 20 because the "incremental costs" of these alternatives were too high relative to their additional benefits, the Corps decision failed to capture and quantify important ecosystem improvements. This led to a finding that these alternatives are inefficient, a finding which we do not believe is supportable when all benefits are considered. (Discussed in Section II of these comments)

We then examine in more detail three specific areas of environmental benefits which were inadequately valued in reaching a decision on the Tentatively Selected Plan.

- The value of habitat connectivity, by the criteria in the Report a critical component of restoration and essential to its success, was either ignored or seriously undervalued in reaching a decision. (Discussed in Section III of these comments)
- Creation of the large nodes essential to adequate habitat and other values, such as hydrology, connectivity and aesthetics, was minimized in reaching the decision (Discussed in Section IV of these comments)
- The importance of the restoration benefits to the human environment, a factor which we believe must be given weight in a restoration project in a dense urban environment such as Los Angeles with inadequate open space and recreational opportunities, is an important decision factor. (Discussed in Section IV of these comments)

FoLAR submits that both the descriptive material and the analysis in Draft Study support Alternative 20. While this provides the most aggressive of the alternatives in the Report, *it is important to note that substantially more comprehensive restoration plans were evaluated and rejected: even Alternative 20 is weaker than what many participants in the study process recommended.*

**I. Important Numerical Decision Criteria Are Set At Minimal Levels Inconsistent With The Report's Stated Objectives And Findings**

**A. Context for Ecosystem Restoration**

Prior to channelization the Los Angeles River occupied a 52 mile flood plain. From old photographs and maps, the flood plain varied in width from several times the river channel itself to sections south of downtown Los Angeles where it meandered over extensive acreage.<sup>2</sup> The original floodplain in its entirety does not necessarily equate with the river's original ecosystem at the time of channelization as some areas of floodplain were already occupied by commercial and agricultural uses. However, most of the floodplain was a continuous 52 mile ecosystem, in that the physical environment of the river and flood plain functioned together as a unit with the numerous living organisms occupying or connected to it, including the people who use it. This ecosystem essentially ceased to exist with channelization. As the Report states, "Due to habitat conversion, natural riparian communities persist only as isolated remnants of what was once a vast, interconnected system of rivers, streams, marshes, and vegetated washes." (Report pp. 1-9, Figure 1-5)

The study initially focused on the 32 miles of river within the City of Los Angeles. In deciding to focus on the 12 mile stretch from Griffith Park to downtown, the Corps determined that the remainder of the river was unsuitable for restoration, primarily because of the unavailability of adjacent land due to existing development. However, applying the same logic to the remaining 20 miles of the river beyond the city boundaries, this determination means that it is highly unlikely that restoration can or will be pursued on 80% river. *Thus, the relatively small feasibility study reach is acting as a surrogate for the entire river, and environmental values should be maximized in this one restoration opportunity.*

Even within the study area, restoration is highly constrained by infrastructure which itself was enabled by channelization. Subsequent to channelization, the I-5 Freeway through the Glendale Narrows, the 134 Freeway north of Griffith Park, the 110 Freeway south of downtown, and additional railroad tracks were constructed and now occupy substantial areas of the original floodplain. *These infrastructure elements could not have been built without a channelized river.* They greatly reduce the acreage available for restoration and seriously limit creation of a continual ecosystem within the study area.

The guiding principal for Corps ecosystem restoration is stated clearly in various places in the Report: Restored ecosystems should mimic, as closely as possible, conditions that would occur in the area in the absence of human changes to the landscape and hydrology. [Appendix G, p 10]. As pointed out below, establishing low threshold criteria for what is adequate restoration is inconsistent with this objective. Frequently stating that "one" of a particular type of restoration is sufficient results in adoption of an alternative which fails to mimic preexisting conditions except in very limited stretches of the study area. This hardly represents a restoration which brings the

<sup>2</sup> See Creason, G., *Los Angeles In Maps*, Rizzoli International, 2010,



river “as closely as possible” to preexisting conditions. This is particularly apparent as the study reach represents only about 20% of the total river, and is the only area where this type restoration is feasible.

For natural communities and habitats, this deficiency is even more glaring. While the report did an admirable job of outlining existing habitats along the river, virtually nothing was said about its historical condition – were there vernal marshes, or alkali meadows along the river, and if so, where, and do any of the Alternatives propose to re-introduce them (or to provide conditions so that they could establish on their own)? California maintains a list of “priority habitats”, tracked by the California Natural Diversity Data Base,<sup>3</sup> many of which were historically present in the study area, and which could be re-established.

The Report itself recognizes these constraints on restoration, and in effect states that *any* of the alternatives proposed provide very limited restoration relative to the original river ecosystem. Given these constraints, the Corps’ final decision should seek to *maximize* restoration of ecosystem values in the study area.

#### B. Artificially Low Objectives Performance Criteria

Instead, within this limited study area, the Report established numerical criteria which allowed the Corps decision makers to adopt a preferred alternative which *minimizes* restoration relative to other alternatives. Referred to as “Objectives Performance Criteria”, these are used to determine whether a particular alternative is adequate to meet the overall study goals and the three specific planning objectives of the study.[p. 4-4]

The Report does not discuss how or why these numerical criteria were adopted. Nor does there appear to be a scientific or technical basis for these. The criteria, in fact, seem to be arbitrary. To the contrary, a number of findings of the Report suggest that these *de minimis* criteria are in fact too low.

The following examines key numerical objective performance criteria in relation to discussion in the Report. (Non-numerical criteria are not discussed.)

1. “Restore a minimum of two aquatic habitat nodes with a natural hydrologic connection to the river and riparian communities with a minimum distance of 150 meters from the water’s edge to create areas capable of functioning as core habitat and refuge for native reptiles and amphibians [ Criteria 1.a, p. 4-4]

#### Discussion:

Section IV of these comments discusses the importance of large nodes in more detail. Alternative 13 includes just two habitat areas: Taylor Yard and the much smaller Arroyo Seco mouth, whereas Alternative 20 effectively has six, adding Verdugo Wash, Piggyback Yard and

<sup>3</sup> <http://www.dfg.ca.gov/biogeodata/cnddb/>

Cornfields, with substantial channel widening effectively adding an additional “large node”. (note that the Cornfields connection also provides connectivity to the large habitat area in Elysian Park.) Considering this, as shown on Table 3 in Section IV, showing the incremental habitat acreage by habitat node which would be added by each Alternative, *Alternative 20 would create almost three times the large node acreage of Alternative 1.*

- a) Specific Planning Objective No. 1 [Sec. 4.2.1], calls for restoration within the ARBOR reach in order to achieve restored ecological processes and biological diversity, a more natural hydrologic regime, reconnection to historic floodplains, and other hydrologic improvements. This suggests that the preferred alternative should maximize the amount of acreage which can be reasonably restored. The Effect of Alternative 13, which includes only two large nodes, is to minimize restoration. Alternative 20 restores about half (58%) of the river channel within the ARBOR area as opposed to less than a third in alternative 13 (29%).<sup>4</sup>
- b) The same planning objective means that new habitat nodes should be provided, to the extent feasible, within the entire study reach. Alternative 13 provides no new large habitat nodes for reaches 1-7, the northern two-thirds of the study area. While there are smaller restoration components north of Taylor Yard, the acreage is small relative to the pre-channelization habitat. Creating meaningful new habitat in this northern area can be done only by including the Verdugo Wash.
- c) Alternative 13 also fails to meet the USACE guidance that ecosystem restoration should mimic as closely as possible conditions which would occur in the absence of human changes. Failure to add any significant new habitat in two-thirds of the study area means the preferred alternative fails to meet the Corps’ own objectives.
- d) Alternative 13 also misses the only opportunity to establish new habitat on the west or southwest south side of the river, by opening a connection to the Cornfields (Los Angeles State Historical Park) and thereby create connectivity to Elysian Park.

Alternative 20 adds a significant new habitat node in the northern segment, in addition to greatly improving regional connectivity as discussed below. The Verdugo Wash area would be the only important new river habitat in the vicinity of Griffith Park, where, prior to channelization, the river’s flood plain provided an extensive riverine habitat directly connected to the park and the mountains. Not only does the Verdugo Wash addition add important wildlife habitat, it greatly improves other benefits including hydrology, air quality, groundwater and the human environment as discussed in more detail in Section II, below. It also allows for a direct connection without entering the river channel between the areas north of the River at Griffith Park (Betty Davis Park) and the study reaches to the south, which would not exist under Alternative 13

<sup>4</sup> Geographical analysis of extent of restoration provided to FoLAR and available upon request.

2. *Restore structurally diverse riparian habitat consisting of herbaceous (e.g., herbaceous vine cover), shrub (e.g., shrubby willow thicket), and tree (e.g., mature cottonwood-willow trees) layers in a minimum of five reaches resulting in three contiguous reaches.* [p.4-4, emphasis added]

#### Discussion:

The analysis in the Report does not state whether this objective has been met. [See Table 6-3 and related text] Our review suggests that it has not been met. Based on the discussion in Chapter 7 , Details of the Tentatively Selected Plan, (Section 7.1), the following appears to be the type of riparian habitat *restored* by Alternative 13:

Reach 1:	Shrubs and Trees
Reaches 2-7:	Shrubs Only
Reach 8	Shrubs and Trees

4

Shrubs are added in all reaches, and trees are definitely added in two reaches. There is a possibility that trees are planned in several more reaches, but these are not referenced in the discussion in Chapter 7. It also appears that Alternative 13 does not restore three contiguous reaches of riparian habitat with both trees and shrubs. (Although not part of the restoration, existing riverine habitat may effectively result in habitat continuity among some reaches.).

Only Alternative 20 would meet this criteria. Alternative 20 (including Alternative 16) includes additional major restoration areas, along with a number of smaller areas. While the report does not provide specific data on the type of vegetation to be restored in these, illustrations suggest a combination of both shrubs and trees.

3. *Restore a minimum of one habitat node with a minimum width of 250 meters (820 feet) to support high frequencies of the Federally endangered least Bell's vireo*

#### Discussion

The Report states: "A riparian strand with a width greater than 250 meters can only be achieved at the Piggyback Yard site, where these river adjacent parcels can support larger scale restoration and sustain enough riparian habitat to support high frequencies of least Bell's vireo." The Piggyback Yard restoration in Alternative 13 is isolated from the river, with a hydrologic connection, if any, through culverts. Thus, the habitat created at the Piggyback Yard by Alternative 13 while Riparian in nature, does not involve a riparian strand, which generally means a shoreline or river bank. A riparian strand is only created by breaking out the concrete in the 250 meter stretch. This is only achieved by Alternatives 16 and 20.

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Thus, by the standard set in the Report, alternative 13 does not meet this criteria. Note also that the Report says this is important for other bird species, not just the least Bell's vireo. [Report, p. 2-2]

4. There are two criteria for hydrology which are closely related and which have inadequate minimum criteria:

*Restoration of natural channel geomorphology in at least one concrete reach support refugia [sic] for native fish including the Federally threatened Santa Ana sucker.*

*Expand River hydrology into at least one large, contiguous river adjacent area within the study area that promotes natural hydrologic connections to the floodplain and overbank areas.*

*Connect river hydrologically (with assistance through culverts or naturally) to overbank with at least one such connection per reach*

Discussion:

The overarching objective here is to provide “a more natural hydrologic and hydraulic regime”. This is important, not just for habitat, but for overall appearance of the restoration and the ultimate appeal of the restoration reach to the public. The Report emphasizes that hydrologic restoration is extremely important [Report Section 2.1.3] Among the numerous points the Report makes to emphasize the importance of hydraulic restoration:

- Ecosystems are completely dependent on hydrology; the hydrologic patterns are integral to this dynamic physical environment [and] hydrology provides connectivity between ecosystems that is critical to regional ecological functioning
- The natural hydrologic pattern is important for maintaining the form of the channel and floodplain, habitat diversity, ecosystem productivity, and biodiversity, and supporting aquatic processes such as exchange of sediment, nutrients, and energy between the river and floodplain.
- Maintaining ecological and evolutionary processes includes natural disturbance regimes, hydrologic processes, nutrient recycling and biotic interactions which can only be achieved with reconnection of the river to its floodplain.
- Reconnection of the river to the floodplain increases the flood carrying capacity of the river, restore a dynamic floodplain and supports diverse riparian and in stream are more beneficial to flood risk management.

These important attributes cannot be reconciled with decision criteria which specify that *only one such occurrence in the study area is adequate*. Alternative 13 is said to meet these criteria



by some channel widening in Reach 6 (24 feet), and significant widening (544 feet) in Reach 6, and Reach 7 (Arroyo Seco). However, hydrologic restoration is not significantly enhanced unless Alternatives 16 and 20 are included. These would add the only significant changes in the upstream reaches (2 and 3), and Reach 5. Major channel restoration occurs only with addition of channel widening in the Piggyback Yard (500 feet) and elsewhere in Reach 8 (1,000 feet).

The same conclusion results with respect to expansion of river hydrology, and hydrologic connections. With the exception of one minimal connection in Reach 4 and one in Reach 3, essentially a stream daylighting under the 134 Freeway, Alternative 13 again relies primarily on the Taylor Yard area to meet this criteria. Upstream and downstream opportunities are underplayed until Alternatives 16 and 20, which would vastly increase hydrologic connectivity and river expansion in both upstream and downstream reaches, and be in accord with the stated objectives of the Report.

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While these comments should not be taken in any way to diminish the importance of the Taylor Yard and Arroyo Seco restoration, the emphasis on only these two sites means that hydrologic restoration in the remaining reaches of the ARBOR study area is minimal to nonexistent,

5. *Restore riparian and wetland aquatic wildlife habitat at tributary confluences to create habitat connectivity to similar upstream habitats on the tributaries with ultimate nodal connection to the aquatic habitats in the San Gabriel and Verdugo Mountains (at least one major tributary connection should be restored.)*

Discussion:

The single major tributary connection in Alternative 13 at the Arroyo Seco is inadequate based on the Report's finding that the Verdugo Wash restoration provides, a connection that historically supported a habitat corridor for movement of wildlife and finds that: "Urbanization has eliminated this habitat corridor, and without restoration of the confluence at Verdugo Wash reconnection of the river to the Verdugo Mountains could not be realized. Restoration at the Verdugo Wash confluence would restore the opportunity for passage to the Verdugo Mountains, a 26 square mile area serving as a 19 stepping stone to the western San Gabriel Mountains." [Report p. 6.27; Figure 6-12, emphasis added] This directly contradicts the Report's finding that Alternative 13 would provide adequate connectivity to the Verdugo Mountains.

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This also shows the inadequacy of the arbitrary criteria of restoring "at least one" such area. Only the Arroyo Seco can provide access to the San Gabriel Mountains, and only the Verdugo Wash can provide access to the Verdugo Mountains (absent a serious stretch of the imagination).

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In addition, the Report states that connectivity to Elysian Park is an important element of connectivity. The Report in numerous spots mentions the importance of connectivity to the

habitat in the Elysian Hills. It is in fact a major planning objective of the study (See Criteria 2): “Increase habitat connectivity between the river and the historic floodplain, and increase nodal connectivity for wildlife between restored habitat patches and nearby significant ecological zones such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains within the ARBOR reach throughout the period of analysis.” [Page xxiii; see also discussion at pp.4-3, 4-55, 6-3, 6-27]

Alternative 13 fails to meet this planning objective. Connectivity to the 575 acre habitat of Elysian Park is only achieved through Alternative 20 via connection of the river to the Cornfields site. The hills of Elysian Park via the Cornfields is the closest large habitat area to the River, and present a unique opportunity to reestablish pre-channelization habitat in a highly urbanized area close to downtown Los Angeles. Connectivity of Elysian Park to other major mountain habitats, such as the Santa Monica Mountains, through the restored river will provide the opportunity to bring new species to Elysian Park and greatly enhance the urban experience.

6. There are closely related criteria for habitat connectivity within the study area itself:

*Lengthen the extent of contiguous vegetated pathways for reptile and small/medium mammal movement (currently limited to Reaches 4 to 6), to achieve upstream and/or downstream connections to at least one additional tributary or habitat area that is currently isolated from the soft-bottom reach.*

*Reconnect natural hydrology between the river and at least one main tributary to support regional habitat connectivity to nearby significant ecological areas.*

The Report also sets out an “ideal” criteria, is to “[p]rovide habitat connectivity (via contiguous or near-contiguous vegetated movement pathways) between all of the reaches within the study area.

#### Discussion:

Considering these criteria, full habitat connectivity within the study area is essential. The Report states the full connectivity among all 8 reaches is achieved by Alternative 13 [Report Table 6-3]. However, this finding is not supported by the connectivity map for Alternative 13 [Report Figure 6-5] Connectivity gaps appear to exist in reaches 1-3 and 7-8. Alternative 20 appears to close these gaps with the possible exception of a small gap in Reach 2.

The Report also discusses the importance of connectivity, not only to major tributaries, but to “other smaller tributaries” [Report, pp. 4-5] Alternative 13 basically provides for a single tributary connection, leading to the question that if tributary connections are so important, how is that a single connection (Arroyo Seco) is sufficient? There appear to be a number of missed opportunities to reconnect with historic tributaries, for example Golf Creek which is a major drainage to the River from Griffith Park. While we understand that it is not be feasible to

connect with each tributary, connection with smaller tributaries such as existed in the Piggyback Yard is the only way to satisfy criteria.

Alternative 20 adds both Piggyback Yard and Verdugo Wash. But it's important to consider that historically there were many more smaller tributaries in the study area. It appears that stream daylighting in the vicinity of Ferraro Fields and Taylor Yard will possibly open additional smaller tributaries, (although this is not mentioned in the analysis in Chapter 6 [Table 6-3]) Given this context, the restoring hydraulic connectivity to support habitat connectivity through only one historic tributary is inadequate and fails to meet the Corp's own criteria. Maximum feasible habitat connectivity within the study area is essential to meet the study objectives

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## **II. Considering Only Immediate Habitat Improvements Seriously Underweights The Benefits of Alternative 20 In The Incremental Cost Analysis.**

The principal basis for rejection of Alternatives 16 and 20 as stated in the Report rests on analysis showing that the incremental costs of these two options are significantly higher than for Alternative 13. Referring to Alternative 20: "It is the most expensive of the four final alternatives and is substantially less efficient than Alt 13 ACE due to a significantly higher incremental cost per gain in output (HUs)." The problem with this conclusion is that in measuring the benefits of the alternatives, the Corps used a methodology that, as stated in the Report, is incomplete. It captures quantitatively only specific habitat values for smaller animal species, which through a complex process are converted to the quantitative measure of Habitat Units. (HU). These values are laid out in Appendix G, and appear to be based almost exclusively on the types of vegetation, i.e., HUs equal primarily the post restoration *vegetative* environment of shrubs and trees.

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There is, of course, much more required to sustain wildlife habitat than just vegetation, and there are substantially more benefits from restoration than just the resulting plant life habitat. *If in addition to the habitat values captured by the model, these additional benefits are adequately considered in the final decision, it will be apparent that the incremental benefits of Alternative 20 will be much higher relative to its additional costs, supporting Alternative 20 as the preferred alternative plan for going forward. I.e., FoLAR submits that, as discussed in more detail below, when these other restoration benefits are fully considered, the incremental benefits of Alternative 20 are approximately the same as Alternative 13, making both alternatives about equally efficient*

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It is also important to note that the incremental cost analysis looks at the gross acreage of the project under the three alternatives, with 16 and 20 being only somewhat higher than 13, thus making the per acreage incremental costs of these appear much higher. We are unable to ascertain from the Report exactly how these acreages were calculated, but regardless we

believe that it is more appropriate to give substantially more weight to the large habitat nodes as explained in Section IV of these comments. This is a more meaningful way to examine the comparative or incremental costs because these larger nodes:

- Provide larger areas of sustainable habitat;
- Require breaking out of concrete with greatly improved hydrology and hydraulics;
- Greatly enhance connectivity both with the ARBOR area and to critical outside habitats;
- Allow greatly enhanced human interaction with the river;
- Allow for much greater groundwater interface and stormwater treatment;
- Come closest to reproducing the original appearance of the river.

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Table 4, page 21, show that Alternative 20 results in roughly three times the area of large nodes than Alternative 13, with consequent benefit to each of these considerations.

#### A. Limitations Of The CHAP Model

FoLAR acknowledges the difficulty of quantifying environmental benefits. an area of environmental science and technology which has been evolving for many years. The Corps elected to use the CHAP model, discussed in detail in Appendix G. CHAP appears to be professionally accepted and quite comprehensive in evaluating the wildlife habitat, primarily the vegetation, immediate to a particular site or “polygon” on a site-specific basis, but does not capture a number of important ecosystems and other environmental values, particularly in an urban environment such as Los Angeles.

Our major concern is that the value of the ecosystem restoration appears to have been determined solely using the CHAP model. The Report itself recognizes that CHAP is not designed to capture other important ecosystem benefits, pointing out that the model does not capture values for restoring wildlife connectivity (one of the 3 main objectives of the study) Likewise, it does not capture values for restoring hydrologic connectivity, critical to achieving resilient and sustainable ecosystem restoration, does not properly consider the richness of this biodiversity hotspot, the rarity of the region’s Mediterranean climate, nor the intense habitat destruction and overdevelopment in the second-largest city in the United States.

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Further, the model appears not to capture ecosystem values for such key items as surface water quality improvements, stormwater runoff treatment, improved groundwater infiltration to enhance water supply, air quality improvements, carbon capture, and the extensive improvements to the human environment. These are values that were essentially eliminated when the Los Angeles River was channelized, and must be considered in reaching a decision on a meaningful ecological restoration alternative. Pre-channelization values can be and need to be recreated.

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Considering these limitations in the model, while the document compares the alternatives, we did not find evidence to support selection of Alternative 13 over Alternative 20 except the



incremental cost differential. This points to an inherent shortcoming in using CHAP as the tool on which to base a decision. In fact, as detailed below, we find much evidence in the document that supports selection of Alternative 20 when considering the other benefits that are not captured in the CHAP model.

Under the Corps' own guidance, the fact that CHAP does not quantify these other important values is not an acceptable reason for not considering them when reaching a decision as to the preferred alternative. The report states that "Corps guidance requires that the ecosystem related benefits of proposed alternatives be subjected to detailed economic analysis, allowing an explicit comparison of the costs and benefits associated with the alternatives. Comparing the alternatives in this manner facilitates the determination of the most cost-effective restoration alternative that meets restoration goals (USACE 2000)". [Appendix G, pp. 10-11, emphasis added]" This guidance does not limit the decision to just vegetative improvements in habitat, but implies that all ecosystem benefits should be considered.

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#### B. Other Environmental Values Which Should Be Considered

The following discusses other significant ecosystem benefits which will result from the proposed restoration. FoLAR understands that there is no single quantitative model which incorporates these. However, there are means of weighing these values which can be employed by the Corps in making its decision as to the preferred alternative. Virtually every major decision affecting the environment requires an evaluation of this type, made by one means or another.

This frequently requires subjective judgments by experts as to the importance of different factors. Even a model as sophisticated as CHAP relies heavily on giving weight to factors which are difficult or impossible to quantify. CHAP required subjective judgments by both the scientists designing the model, and the scientists in the field when evaluating individual field factors in the 172 polygons, translating these judgments into numerical values or weights.

Thus, we believe it is possible and important to have a process which gives weight to the various benefits not captured by CHAP. To illustrate this, and to show the effect of weighing other factors on the incremental cost benefit analysis, we have prepared Table 2 and a brief discussion of each of the ecological improvements which we believe must be considered. We have done this by

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- (1) assigning a percentage weight to each unquantified value relative to the total average annual habitat units. We have used the term "units" for these additional values *For example*, we have assumed that habitat connectivity has roughly 40% the importance of the vegetative habitat itself, thus creating a "connectivity value" in Alternative 13 of 1,948 "connectivity units."
- (2) Then to reach a value for Alternative 20, we have assumed based on the Report that this alternative provides roughly three times as much connectivity as Alternative 13, yielding 7,082 "habitat connectivity units" for Alternative 20.

Each of the additional values was considered as follow. To arrive at these, we have used discussion in the Report, input from other public responses, and information provided by experts consulted for these comments.

1. Habitat (Wildlife) Connectivity:

This is one of the three principal objectives of the ARBOR restoration, and is discussed in detail in Section III of these comments. Habitat restoration in the absence of reasonable connectivity among the restored units and between restored units and other habitats, such as the Verdugo Hills and San Gabriel Mountains, will render the ARBOR project significantly less meaningful. *Thus we have assumed that connectivity should be valued at 40% of the base HU's.*

Our determination that the enormous benefits of connectivity were not valued or weighted in the model is verified in Section 6.3 Objectives Comparison of Alternative Plans, page 6-8 and in Appendix G: Habitat Evaluation (CHAP), page 61, Section 9.0, the last paragraph, which recognizes the *“Additional benefits not captured in CHAP were used to evaluate and compare the final array of alternatives. These benefits include hydrologic connectivity to support biotic and abiotic functions, and nodal connectivity to support wildlife movement and dispersal. An assessment of these benefits is applied outside of the CHAP analysis as part of the environmental impact analysis.”*

Based on the discussion and maps in Section 4 [pp. 4-42 et seq.] Alternative 16 adds limited connectivity, primarily by river bank modifications and addition of several restored strips. Alternative 20 adds major connectivity through Verdugo Wash, Cornfields to Elysian Park, enhanced in-river connectivity, and improved Piggyback Yard connectivity. *We have assigned a wildlife connectivity weight of 1.6 to Alternative 16, and 4.5 to Alternative 20.*

2. Hydraulics and Hydrology

This category encompasses hydraulic connectivity, principally between the large restoration nodes and the river, groundwater interface for restoration nodes, river expansion and widening, and achieving a more natural appearance. The Report discusses this as an important element of restoration. Report Section 2.1.3] Without significant hydrological improvements, the restoration will be less effective and the appearance of the river will not be as desirable to the community and to river users. *Thus we have assumed that hydraulics and hydrology should be valued at 20% of the base HU's.*

Specific aquatic connectivity increases are discussed in Report Tables 6-2 and 6-3 and related text as pertains to restoration nodes. Expansion of restoration nodes with related hydraulic expansion and connectivity occurs somewhat in Alternative 16, and is substantially greater is great in Alternative 20. The same applies to river widening. *We have assigned a hydraulics and hydrology weight of 1.5 to Alternative 16, and 3.0 to Alternative 20.*

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### 3. Water Quality.

The Report highlights that improved surface and ground water quality are important results of restoration, a highly desirable environmental benefit. The introductory letter to the Report states that restoration “reduces flow velocities, increases infiltration, improves natural sediment processes, and improves water quality”. However, there is little if any discussion of water quality specific improvements by alternative, nor does it appear to be a factor which was weighed in selecting the appropriate alternative. The Report only states that water quality benefits are “ancillary” and thus not considered. [Report P. 2-20]

Maintaining enhanced water quality is in fact highly important to sustain habitat. The report discusses in some detail the Los Angeles regional Water Quality Control Board’s program for establishing pollutant levels and regulations through Total Maximum Daily Load [TMDL’s] for the river and other related water quality regulations. In addition, to the extent groundwater infiltration is enhanced in both quantity and quality, the project lead to greater quantities of groundwater available for public use.

While we understand the difficulty in quantifying these improvements, we believe they must be considered in evaluating the beneficial value of each alternative. *Thus we have assumed that hydrology and hydraulics should be valued at 15% of the base HU’s.*

Both surface water quality improvements, such as reduced sedimentation and possible other pollutant reduction, will result from the ARBOR project. Improvements also will be expected to ground water quality. These are to a great extent dependent upon establishing large habitat nodes consisting primarily of wetlands, i.e., the increase will be proportional to the amount of wetlands created in new nodes, vegetative interface with surface water flows in these areas, and the ability of these restored areas to capture and infiltrate storm water. *We have assigned water quality a weight of 1.3 to Alternative 16, and 2.8 to Alternative 20.*

### 4. Species Diversity and Large Mammals.

The CHAP model excludes the habitat benefits related to large mammals and extirpated species. It is limited specifically to resident and migratory birds, including raptors, reptiles, amphibians, small mammals and fish [Appendix G, pp. 12-13]. Recent work as part of the Griffith Natural History Survey study [See P. 17] has found that the river is also important for larger mammals such as mule deer, coyotes, bobcats and possibly mountain lions.

Other than a list of federally and state endangered species in one of the appendices, the Report presents no analysis of dozens of species that once occurred in the ARBOR area, or more widely along the river, whose populations could be restored by various alternatives, including California Native Plant Society rare plants, California Species of Special Concern, or other lists normally used in environmental review. It is possible that such a reintroduction could only occur at the largest, most hydrologically connected patches of restored habitat, such as those envisioned in Alternative 20.

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The same applies to extirpated birds –the Federally Endangered least Bell’s vireo is mentioned repeatedly, but no information is provided as to where it is still persisting along the river, what local habitat requirements it might have within the watershed, nor where individuals have been observed attempting to set up territories along the river. Similarly, the western pond turtle (California Species of Special Concern), persists in remarkably urban areas, but which has been eliminated from the entire lowland portion of the river. *Thus we have assumed that species diversity and large mammals should be valued at 10% of the base HU’s.*

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A combination of large patch size *and* retained hydrological connectivity, such as provided only in Alternative 20, would provide an additional major benefit for large mammals and species diversity. *We have assigned these a weight of 1.5 for Alternative 16, and 3.0 for Alternative 20.*

#### 5. Air Quality

The Report addresses air quality primarily as a consequence of project construction and operation, but does not count air quality improvements among the objectives and benefits of the project. The problem of greenhouse gasses, particularly carbon dioxide, is a matter of great public policy concern, and to the extent that greenhouse gas reduction is a benefit of restoration, it should be considered in the final decision. Considering the difficulty in measuring these improvements, *we have valued air quality improvement at 5% of the base HU’s.*

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Carbon capture is well understood to result from increases in the amount of vegetation in any given area, and benefits will be proportional to the amount of vegetation added by each alternative. Because there is no calculation of this in the Report, we are assuming that potential carbon absorption through an increases in plant life in the ARBOR area to a substantial extent will be proportional to the large habitat nodes, and have *assigned water quality a weight of 1.2 to Alternative 16, and 23.8 to Alternative 20*

#### 6. Human Environment

While also difficult to quantify, the benefits of restoration to the human environment from the ARBOR project nevertheless should be considered in the final decision. These benefits are detailed in Section V of these comments. The essential point is that in a dense urban area such as the ARBOR study area reaches of the river, the human environment cannot be ignored in a restoration decision. The people living in the vicinity of the river and those using the river and otherwise benefiting from, are an integral part of the riverine environment.

Prior to channelization, the river was essentially open to public uses and was easy to access, i.e., the human environment was an integral part of the river ecology. The river and its floodplain represented a major area of open space for its entire 51 mile length. With channelization, what was left of the river was fenced off from the public except a small segment in the Sepulveda Basin. Since then, the city with many varied communities has grown immensely, crowding up against the river in many locations. During this same period, open space has steadily diminished.

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The report does consider the benefits from enhanced recreation, which are more quantifiable than other human benefits. However, it does not appear that recreational benefits were incorporated into the incremental cost benefit analysis. Considering this, in our analysis we *have assumed that improvements to the human environment from restoration should be valued at 20% of the base HU's.*

We also have assumed that the human benefits are roughly proportional to the extent of large node restoration, as these will provide the greatest opportunities for involving people with the river, and the greatest aesthetic benefits, and the most concentrated improvements to air and water quality. For example, the benefits of the Piggyback Yard to an open space-starved area like downtown and east Los Angeles are probably greater than they are in Griffith Park. We *have assigned the human environment a weight of 1.5 to Alternative 16, and 3.0 to Alternative 20, representing the approximate level of restoration.*

TABLE 1

Ecological Benefit	Unit Value As % Increase of HU Base	Alt. 13 Units	Alt 16 Multiplier (To Alt. 13)	Alt. 16 Units	Alt 20 Multiplier (to Alt 13)	Alt. 20 Units
Total Average Habitat Units (HU Base) (Source: Table ES-1)		5,902		6,509		6,782
Habitat Connectivity Units	40%	2,361	1.6	3,777	4.0	9,443
Hydrology/Hydraulics Units	20%	1,180	1.5	1,771	3.0	3,541
Water Quality Units	15%	885	1.3	1,151	3.0	2,656
Large Mammals/Species Diversity	10%	590	1.5	885	3.0	1,771
Air Quality Units	5%	295	1.2	354	2.5	738
Human Environment Units	20%	1,180	1.5	1,771	3.0	3,541
TOTAL UNITS		12,394		16,218		28,472



To illustrate how this affects the incremental costs of Alternatives 13, 16 and 20 , we have used a simple comparison of the total units with the total cost of each alternative as used in the Report [Table ES-1]

TABLE 2

	Alt. 13	Alt 16	Alt 20
Total Units	12,394	16,218	28,471.9
Cost	\$442,000,000	\$757,000,000	\$1,040,000,000
Cost/Unit	\$35,662	\$46,677	\$36,527

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Thus, Alternative 13 approximately equal in efficiency in this illustration. We understand there can be disagreement as to exact details and factors used in the illustrative case we've presented above. We have been reasonably conservative in our assumptions; however even adjusting the assumptions to be more conservative still results in an incremental cost of option 20 that is much lower than projected in the Report and reasonable close to Alternative 13. Option 13 certainly is by no means twice as efficient (or one-half the incremental cost per unit) as determined by the Report. In light of this, we submit that Alternative 20 should not be rejected on inefficiency based on incremental costs.

### III. The High Value Of Connectivity

The key paragraphs supporting the selection of the more robust connectivity in Alternative 20 state:

*"Generally, nodes have a greater overall interaction when they are larger and closer together (Linehan et al 1995). Well-connected systems prevent inbreeding depression and disease, and have a lower extinction rate as populations can more easily colonize if they are highly connected (Noss 1983; Schippers et al 1996). Without connections between habitat areas, isolation and loss of genetic diversity is imminent (Hobbs & Saunders 1990)."*

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*"In order to benefit the biological integrity of a landscape, corridors should be restored to allow for dispersal between habitat areas. More corridors equal more routes to suitable habitat, creating more opportunities for dispersal. A complex network of nodes and corridors is therefore critical to restoration in an urban environment, as suitable habitat often remains unused if isolated (Hanski & Thomas 1994)."*

#### A. Importance.

A well-balanced ecosystem needs these mountainous connections to be sustainable genetically and in terms of food, cover, refuge, and territories for the flora and fauna that once thrived in

and along the Los Angeles River. Connectivity greatly influences the distribution of species on the landscape, the distribution of a single species, and the distribution of genetics or gene flow. Discontinuous pieces or nodes of habitat change the organisms and their relationships, especially in the food chain. The connectivity to other large expanses of habitat ensures ecological resiliency and long term sustainability. It is precisely these types of historic connections and corridors provided in Alternative 20 that could enable the reintroduction of Steelhead and other native species into and adjacent to the river by restoring the historic aquatic habitat that once existed in this area.

Improving the habitat and the connections to the river, particularly transitions to large open space areas is important. Habitats on both sides of the river, tributaries, and other expanses of land create corridors that mammals, birds, reptiles, and other species heavily utilize. Medium and large mammals cross the Los Angeles River and are monitored in studies by the Los Angeles Natural History Museum. The habitats, substrate, and hydrology in those corridors play important roles in the connections these animals use.

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Since 2011, the Griffith Park Natural History Survey has been conducting research into wildlife usage in and out of Griffith Park, including into the Los Angeles River channel in the ARBOR area. The results of this research have been presented in numerous articles and at lectures over the past two years, and have been posted on the Friends of Griffith Park website for many months. In it, the study documents mule deer, bobcat and coyote using tunnels, culverts and bridges to move into and/or over the Los Angeles River channel adjacent to Griffith Park. These were not cited or discussed in the report.<sup>5</sup>

#### B. Specific Areas With High Connectivity Importance

1. Verdugo Wash. The Verdugo Wash confluence with the river is arguably the most critical movement area for wildlife between Griffith Park and the Verdugo/San Gabriel Mountains via the Los Angeles River. Restoration there would have a major, landscape-level influence over wildlife populations in both areas by restoring historical gene flow between the two areas with respect to both common species and scarce species. The Verdugo Wash tributary to the Los Angeles River northeast of Griffith Park connects both of these waterways to the San Rafael Hills and the Verdugo Mountains. The river corridor to the mountains provides life-supporting connections for the animals in the ecosystem. During times of biological stress caused by urbanization, fires, floods, and climate change, the survivability of plant and animal life and sustainability of the ecosystem depends on the large expansive connections of the rivers and mountains. The benefit of connectivity of the Verdugo Wash to the mountains is a critical component of any ecosystem plan and must be included in the Federal project.

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<sup>5</sup> <http://www.friendsofgriffithpark.org/GPNHS/Griffith.htm>

2. Piggyback Yard. The Piggyback Yard, with a restored river connection, would serve as a habitat anchor for species moving south along the river, where currently it is a “dead end” with a barren cement channel south of I-5. Since Piggyback is so isolated by industrial development, there is something of a “water in the desert” effect for any restoration action there, which could be weighted higher than simply augmented existing habitat areas.

The Piggyback Yard is important in the ecosystem restoration because it connects the Los Angeles River with over 100 acres of open space by removing concrete from the channel and replacing it with terracing and new riparian habitat in a highly urbanized area of the City. Alternative 20 removes the concrete channel wall retained in Alternative 13. Without removal of the wall the Piggyback Yard is limited in use to only birds or creatures that can fly. The value to the ecosystem is again the biodiversity created and the ability of species to find refuge in biologically stressed situations. Piggyback Yard is therefore extremely important to sound ecosystem restoration.

Beyond just connectivity, The Piggyback Yard is an excellent example of the improved quality of habitat created through Alternative 20 versus Alternative 13. Both alternatives claim the 113 acres for restoration of the Piggyback Yard. Alternative 13 does not include channel modifications but uses the existing storm drains in the channel wall to convey flows from the historical wash. In Alternative 20 (Page 4-58) *“the historical wash would be restored through the property with a riparian fringe as well as other side channels, and river flows would be diverted out of the River into [the] Piggyback Yard creating a large wetland area. A railroad trestle would be included with this alternative to allow the described restoration to occur and allowing for the connection of the river channel and the adjacent restored areas.”*

The Los Angeles River would primarily connect birds to the site because mammals, reptiles, and other wildlife that cannot fly will not be able to scale the wall to connect to the restored Piggyback Yard. The minimal connections through the storm drains in Alternative 13 do not perform the same value or quality of restoration as Alternative 20. Alternative 20 removes the concrete wall and then restores the hydrological connection in a more natural way than the culverts through the concrete wall. Alternative 20 reintegrates the hydrology and biology from the Piggyback Yard with the Los Angeles River.

3. Los Angeles State Historical Park. The hydrologic connection from the Cornfields site would be restored with terracing to the Los Angeles River. Wetlands would be restored at this site. Los Angeles State Historic Park lies at the southern terminus of a crucial zone for native wildlife south of Griffith Park – the patches of open space extending through Franklin Hills and Elysian Park. Restoring the river at this location would “complete the loop” here, allowing wildlife to disperse south from Elysian Park into the river, and back to Griffith Park (or vice-versa). [Report p. 6-27]

The Cornfields site is another good illustration of the quality of restoration. In Alternative 13, Reach 7, the channel wall remains in place with vegetation being planted on the top of the bank in planter boxes. This will improve the aesthetics, but will not improve the habitat and wildlife value much, nor support connectivity. Whereas in Alternative 20, the wall is removed and replaced with terracing, freshwater marsh or wetlands are restored and connected under a railroad trestle to the main channel of the Los Angeles River. This reconfiguration costs more and results in a far greater quality of habitat than Alternative 13. Higher valued habitats are achieved because of the restored hydrologic connection and the redesign of the habitat connections through terracing and streams. Thus, both the quantity and quality of restoration is greatly enhanced in Alternative 20.

### Summary

Alternative 20 provides the greatest connectivity of the final four plans. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. The restoration of a more natural connection to Verdugo Wash substantially enhances the benefits of the ecosystem restoration by providing connectivity for wildlife and plants into the historic floodplain of the Verdugo Wash and into the Los Feliz Golf Course, the Verdugo Mountains, and the San Gabriel Mountains.

As stated in of the Report: [p. 6-2

*“Restoration of the Verdugo Wash confluence would also provide [a] 34 acre habitat node in the Study Area, with connectivity to the Los Feliz Golf Course via existing habitat in the Glendale Narrows (Figure 6-11) and connectivity through the downstream reaches... [and], ...in addition to the regional connectivity in Alternative 13, provides a future connection between the LA River and the Verdugo Mountains, a connection that also historically supported a habitat corridor for movement of wildlife.*

*“The added restoration at the Cornfields site in Reach 7 provides a 9 acre riparian habitat node that decreases the distance between habitat nodes in the resource poor downtown area (Figure 6-11).*

*In Alternative 20, local habitat connectivity would increase 120% within the study area over Alternative 16, through restoration of the natural hydrology and habitat at the Verdugo Wash site and its connection to Taylor Yard via existing in-channel habitat in the Glendale Narrows, as well as through restoration of hydrology and habitat at the Cornfields site, which adds a habitat node and decreases distance between nodes in the resource poor downtown area.”*

*Additional habitat in the community of San Rafael Hills could also be incorporated into the movement corridor as a regional habitat node. Regional habitat connectivity is further improved by restoring connections between the river and the 575-acre habitat node at Elysian Park via restoration of the Cornfields site.”*

Connections to large areas of land such as nearby mountain areas create connectivity of habitats and species. By providing connections between habitat areas, corridors enable wildlife

migration and breeding of plants and animals. As a general rule, the wider the corridor, the better. Wider corridors suffer fewer impacts from adjoining land uses and have fewer edge threats from invasive weeds and predators. Additionally, the multiple large habitat areas provided in Alternative 20 will enable populations to survive and repopulate after disasters impacting the mainstem of the Los Angeles River. Thus, the habitats and species will be more resilient and self-sustaining over the life of the project.

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#### IV. The Tentatively Selected Plan Fails To Create The Large Nodes Essential To Adequate Restoration

##### A. Large Nodes Created.

There are only four large (>5-acre) nodes or patches of riparian/wetland habitat that would be created or connected to the river under any alternative:

- Verdugo Wash confluence
- LAR State Park/Taylor Yards
- LA State Historic Park/Cornfields (north end)
- Piggyback Yard

We also consider that the channel widening in Alternative 20 effectively creates a new, in-channel, habitat node.

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TABLE 3  
**New Habitat Nodes Created with True Hydrologic Connectivity to River**  
(Acres)

	Verdugo Wash	Taylor Yard	Arroyo Seco	Piggyback Yard	Cornfields	Widen Channel (note 2)	Total (note 3)
Alt. 13	0	119	14	0	0	0	<b>133</b>
Alt 16	0	119	14	112	0	45	<b>290</b>
Alt 20	34	119	14	113	9	45	<b>334</b>
Alt 20+	34	119	14	113	41 (note 1)	45	<b>366</b>

Source for Acreage of Habitat Nodes: Report, Chapter 6, Connectivity Maps

1. Assumes that with hydrologic connectivity, entire Cornfields effectively becomes habitat as per the Report, p. 6-27 . Also, this allows connectivity to Elysian Park, 575 Acres which would not otherwise exist.
2. New in-channel habitat
3. Table 7-1 shows a total of 588 acres restored in Alternative 13, but per Chapter 6, about 1/3 of this would be considered “new large habitat nodes”.

Of these, three would remain unconnected to the river if Alternative 13 were chosen over 20.



B. Benefit of Large Nodes.

Specific patch or node size requirements of common and characteristic wildlife are typically not found in published literature, but are often well known to local experts who observe species through years of fieldwork in a given area. Years of restoration has occurred at pocket parks and, passively, along the channel bottom; yet, many species of native and special status wildlife still cannot live along the river, including any native fish, most amphibians, and most riparian-obligate birds

In the Los Angeles area, native small mammal, terrestrial bird and reptile/amphibian species such as Audubon's cottontail, western toad, and California Quail simply cannot move through inhospitable habitat like the (existing) Los Angeles River channel or residential neighborhoods, and would only be found at large nodes. (Several of these would likely require a semi-natural flood regime as would be enabled only through bank-widening and restoration of hydrologic connectivity).

Unfortunately, only the baseline conditions of the un-restored river were analyzed and emphasized in the report, resulting in statements like the following, which constitutes the *entire discussion* of the study area's current and potential mammal usage:

“Because of the study area's scarce vegetation, minimal connection to other habitat areas, and extremely limited riparian communities, wildlife species that are the most tolerant of human activity and the extremely modified landscapes inhabit the study area. Common mammals include opossum (*Didelphis virginiana*), black rat (*Rattus rattus*), raccoon (*Procyon lotor*), California ground squirrel (*Spermophilus beecheyi*), fox squirrel (*Sciurus niger*), striped skunk (*Mephitis mephitis*), coyotes (*Canis latrans*), and several species of bats (CDFW 1993).” (3-39)

An increase in habitat patch size and connectivity along the river through large habitat nodes subject to regular natural flow – as maximized in Alternative 20 – would obviously result in a major increase in species diversity beyond the other Alternatives proposed; but without any current species data presented from the area or reviewed, it appears this was never quantified.

Most robust habitat restoration plans include a discussion of indicator (or target/focal) species. This is essential for project evaluation and success. Indicator species along the Los Angeles River include those that are currently dependent on certain riparian/wetland habitats that would expand their ranges variously with the different restoration Alternatives. Some analysis was suggested in the Report:

“Within 5-10 years of construction, restore and maintain dense, structurally diverse riparian habitat sufficient to maintain survival and reproductive needs of wildlife. Restore a minimum of one habitat node with a minimum width of 250

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meters (820 feet) to support high frequencies of the Federally endangered least Bell's vireo (Kus 2002)." (Report p. 4-4)

However, the thresholds were so low (e.g., "a minimum of one habitat node") as to negate the potential benefit of expanding multiple restoration areas under various alternatives – at times, despite the same report's own claims in different sections of the same report:

"The project would restore large nodes of riparian habitat that would support the Federally endangered least Bell's vireo...Restoration of large nodes of riparian habitat could also support yellow breasted chat and yellow warbler (State Species of Concern)." (2-3)

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Undoubtedly, "nodes" are better than "node", particularly to the rare native species the plan intends to support. Yet, the *relative value* of two plans that restore (through hydrological connectivity) four versus one node of such habitat, to various target species, appears to have not been quantified the CHAP process.

#### C. Large Nodes and Hydraulic Connectivity

Alternative 20 is the only alternative that allows for river water to directly wash over and "passively restore" three of the four large blocks or nodes of open space proposed for restoration: Verdugo Wash confluence, Los Angeles State Historic Park, and Piggyback Yard.

The report's own wording appear to strongly make the case for capturing and elevating the importance of hydrologic connectivity:

"Maintaining ecological and evolutionary processes includes natural disturbance regimes, hydrologic processes, nutrient recycling and biotic interactions (EPA 1999). This can only be achieved with reconnection of the river to its floodplain...Biogeochemical interactions between the river and terrestrial sources are not as vital to riparian systems as overbank flow from floodplain connections (Hein 2003)...The larger sites are more beneficial to flood risk management. Without channel widening in the proposed locations...opportunities to restore a comprehensive, sustainable ecosystem would be limited." [Report Section 2.1.3] Emphasis added]

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Portions of the plan recognize the critical need to maximize the ability for water to flow overland at multiple points along the river channel – that is, to restore hydrological connectivity from the river into *upland* areas by removing areas of concrete. Yet, the value in having this occur at multiple locations seems to have been lost in the analysis.

#### D. Importance for Wildlife.

The Integrated Feasibility and EIS/EIR does not cite important local studies authored by highly respected biologists and others. The Feasibility Study concludes that few Federally-listed

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species are found in the Los Angeles River area. No State species of concern are listed. However, it is important to examine the species whose range is biogeographically in the surrounding areas, mountains, and tributaries. These will all benefit from the creation of large habitat nodes on the river. Habitat loss and fragmentation lead to a breakdown in ecological processes such as wildlife migration, seed dispersal, pollination of plants, and other natural functions that are essential for ecosystem health.

The result is decline in biodiversity (biological diversity) and local extinction of sensitive species. Habitats should be created and managed to enable the reintroduction of the native species that once inhabited the Los Angeles River basin. The studies show there are many species that are progressively “blinking out” or being extirpated from the LA River system because channelization and urbanization have diminished their habitat so dramatically over the last 50 years. The Corps has the opportunity now to lead the way to substantial and meaningful restoration for many of these species by implementing Alternative 20.

The Natural History Museum is currently conducting a biodiversity study along the Los Angeles River near the downtown and Griffith Park area. This 3-year study will perform continuous sampling of multiple variants on a weekly basis for 30 stations. The study will address the biodiversity along the river in an urbanized environment. The NHM study will provide baseline conditions with which to compare biodiversity along the river with the implementation of Alternative 20.

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## **V. Restoration Benefits To The Human Environment** **Must be given Substantial Weight**

The effectiveness of an urban ecosystem restoration project should not rely solely on the cost effectiveness of the creation of habitat units, but must also consider its relationships to the people and communities it serves.

### **A. System of Accounts**

Congress in the 1970 Flood Control Act identified four equal national accounts for use in water resources development planning - national economic development (NED); regional economic development (RED); environmental quality (EQ); and social well-being (OSE), other social effects). As the report states,

*“The four categories, known as the System of Accounts as suggested by the U.S. Water Resources Council, address long-term impacts and are defined in such a manner that each proposed plan can be easily compared to the No Action plan and other alternatives. Collectively, the four accounts are required to include all significant effects of a plan on the human environment”* (Page 6-31).

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The selection process of Alternative 13 over Alternative 20 does not appear to have given proper significance to all the categories of the System of Accounts – specifically, the RED and OSE accounts – especially with regards to “effects of a plan on the human environment.” The measurement of the effectiveness of an urban ecosystem restoration plan is not just habitat units. The measurement must include its interaction with the people and communities it will serve now and into the future.

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B. Demographic Factors and Jobs.

Appendix B: Economics of the report indicates that nearly 129,000 residents live within a half mile of the footprint of Alternative 20 – considerably higher than Alternative 13 given its lesser size (Page 14). Specific to Alternative 20 is its ecosystem restoration development in connection with the Los Angeles State Historic Park, an area referred to as Chinatown-Cornfields. This general area, south of the SR-110 freeway, has nearly 26,000 residents that are not particularly served by Alternative 13. According to Table 3-4 of the appendix the overall poverty rate of this area is 22 percent. Further, Table 3-1 indicates this population is a minority population with it being 92 percent non-white. As common in an urban area of low income/minority population the availability of parks is scarce. This area covered by City Council District 1 ranks 9<sup>th</sup> out of the city’s 15 districts with less than 5 acres of parkland per 1,000 residents (Page 106). Alternative 13 does little to address the concerns of this area.

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The selection of Alternative 13 looks to have not fully recognized the difference with Alternative 20 on a RED basis. Table 6-8 of the report indicates that the construction period of Alternative 20 would produce 9,001 jobs with wages of over \$500 million in comparison to Alternative 13 with its 1,986 jobs and \$114 million in wages. But these numbers are only for construction.

Ecosystem restoration provides the “seed capital” for revitalization. The RED analysis of Appendix B shows Alternative 20 would spur redevelopment creating over 5,000 jobs with wages in excess of \$336 million over the long-term as compared to Alternative 13 with nearly 1,300 jobs and \$85 million in wages (Appendix B, Table 8-49).

Along with this redevelopment come permanent jobs. Businesses and houses that are constructed are not intended to be vacant. Appendix B, Table 8-53 displays the difference between Alternative 13 and Alternative 20 on an average annual basis over the life of the project. Alternative 20 is estimated to have 1,464 permanent jobs (nearly 1,100 more than Alternative 13) with wages of \$83 million (a wage differential of \$62 million over Alternative 13) on average for each year of the analysis. Of additional significance to these numbers is where the majority of the difference comes. Tables 8-43 thru 8-46 of Appendix B reveal the Chinatown-Cornfields area as the primary source for Alternative 20’s greater impacts. Potential long-term economic improvements in this challenged area should be considered when comparing Alternative 20 to Alternative 13.

Table 4

Redevelopment Long-Term Average Annual Impacts		
	Alternative 20	Alternative 13
Jobs	1,464	370
Labor Income	\$83,046,000	\$20,990,000

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### C. Health and Social Benefits

Appendix B reports:

*“In a recent Environmental Science and Technology article the authors report that there is evidence that urban residents living in greener environments may be significantly healthier than those living in environments with less green space, and the presence of water may create even greater health improvements. Most notably for low-income and minority residents, inequitable urban development and the privatization of natural amenities has contributed to environmental injustices in the distribution of green space and water features. Collectively, this can cause disparities in health-related behaviors and obesity.” (B-95)*

As documented in Appendix B, the CCPHA found the total annual estimated cost to California for overweight, obesity and physical inactivity was \$41.2 billion with \$20.2 billion of this amount attributable to physical inactivity. (B-97) The appendix also indicates in Figure 9.5 that obesity for minority children as compared to whites can be 70 percent higher for Hispanics and nearly 50% for African Americans.

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The Centers for Disease Control and Prevention supports the goal of creating or enhancing access to places for physical activity, the enhancing physical education and activity in schools, and supports urban design, land use policies to encourage physical activity. The additional and upgraded ecosystem restoration features of Alternative 20 should be considered, especially as there is nearly double the number of schools for this plan and its physical coverage also double as to Alternative 13.

Additional trails, access points, parking areas, and bridges are included in the alternatives. These would provide linkage and connectivity to the restoration areas as well as to existing parks, thereby improving community cohesion. Benefits would be seen under the alternatives and would provide a common place for residents of various socio-economic backgrounds to recreate and interact. This would help create a sense of community and belonging. In turn, these beneficial social effects would potentially influence the enhancement of surrounding areas to conduct similar activities. Alternative 20 with its larger scope will produce a greater connectivity with the people and communities of the study area.



## VI. Conclusion

Ecosystem restoration projects provide valuable quality and quantity of aquatic and riparian systems. The selection of the final plan should be determined by using multiple factors. The CHAP model and CE/ICA are only some of the tools that should be used in the selection process.

### A. Properly Applied Decision Criteria Support Alternative 20

The Corps set numerical decision criteria for adequacy which are artificially low and led to selection of the "low hanging fruit" for restoration rather than a plan that truly restores the historic values for species, habitat and people. The study narrowed its focus on an 11 mile stretch of the 32 mile river running through LA that has the best chance for restoration. Alt 13 reduces the length of restoration to only 3 miles. This minimal criterion is inconsistent with the stated objectives of the study and seems to be based only on the costs without comprehensively addressing the significantly greater benefits for species and habitat in Alt 20.

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NEPA utilizes the perspective of *significance* of resources to address impacts. Alternative 20 exhibits the most short term impacts primarily because of additional construction of the larger plan. None of these impacts rise to a level of significance. However, Alternative 20 generates the most beneficial impacts for the biological, human and physical environment. The long term beneficial impacts caused by Alternative 20 are significant based on institutional, public recognition, and technical recognition criteria. Implementing Alternative 20 will have profound positive impacts on the biological resources, hydrological and hydraulic resources, air quality, water quality and recharge, education, recreation, health, economics, human ecology, disadvantaged communities, environmental justice, and the general sense of wellbeing in the urbanized area.

These positive benefits in the Integrated Feasibility Report are greatest in Alternative 20. The USACE was the first to lead the nation in addressing Environmental Operating Principles in water resources planning process and decision making. Alternative 20 is the embodiment of those principles! Given all these reasons, the USACE should support Alternative 20 as the Federally Selected Plan.

### B. Alternative 20 Is No Less Efficient Than Alternative 13.

The Integrated Feasibility Report itself supports selection of Alternative 20 except in the conclusions based on the cost of Average Annual Habitat Units and total cost. But as we have shown, when all restoration benefits are considered, this does not make Alternative 20 any less "efficient" on an incremental cost basis than Alternative 13. In fact, Alternative 20 achieves true restoration for the impacts caused by channelization of the river. Alternative 20 is practical and can be implemented as the Federal project. Implementing Alternative 20 will substantially restore the river in this 6.4 mile segment. Alternative 20 is the opportunity to select the Best

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Buy plan that provides the best scenario for long term success and sustainability of the habitat, species, environment, and people in the urbanized Los Angeles River study area and beyond.

While costs are a consideration, Alternative 20 is the most costly of the four best buy plans (Table 4-10 Final Array Costs and Outputs, page 4-47) because it restores more habitat and major connectivity to large blocks of land than just the relatively “low hanging fruit” restored in Alternative 13. Alternative 20 requires more land acquisition, much more concrete removal, raising a railroad trestle, and restoring several additional hydrological and biological connections to the Los Angeles River. These actions are indeed costly, but create tremendous benefit by restoring an ecosystem that can survive indefinitely because of its size and robust connectivity. These elements were not valued in the CHAP model, CE/ICA, or the selection of the TSP.

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#### C. Alternative 20 Meets All Performance Targets

Performance targets for ecosystem restoration were established for the two major objectives: *Objective 1: Restore Valley Foothill Riparian and Freshwater Marsh Habitat* and *Objective 2: Increase Habitat Connectivity*. In Section 4.12 SELECTION OF THE FINAL ARRAY Table 4-8 and Table 4-9 analyzed all the alternatives to determine which ones meet the 19 specific targets developed for the two objectives. Alternative 20 meets every one of the 19 targets developed for the two objectives with the highest score and often with an incremental increase. Alternative 13 does not.

Utilizing the USACE Planning Guidance (ER 1105-2-100) objectives stated in Section 6.3 (Page 6-8), Alternative 20 is clearly the superior choice of plans. Alternative 20 comes the closest to mimicking the natural conditions and processes that would have occurred had the Los Angeles River not been channelized. It exhibits the best ability “*to continue to function and produce the desired outputs with minimum of continuing human intervention*” because of the size, regional and local connectivity, and restored hydrological and biological connections that create the ecosystem and enable a high degree of self-sustainability of landscape and species. Additionally, the document states:

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*“Restoration projects should be conceived in a systems context ... in order to improve the potential for long-term survival as self-regulating, functioning systems...Considerations should be given to the interconnectedness and dynamics of natural systems...”*

Again, these criterion and objectives lead to the selection of Alternative 20.

#### D. Costs Related to Effects

Cost is a factor in today’s constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. Real estate costs are a major factor in any development in an urban area, including ecosystem restoration developments. Land acquisitions in the City of Los Angeles will be expensive. However, the scarcity of habitat and

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ecosystems in an urban area are far more valuable than in other parts of the nation because of that scarcity.

The City of Los Angeles is the second largest city in population in the U.S. The value of the ecosystem should be valued even higher in light of the dearth of such habitat in the area. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the Los Angeles River to multiple large corridors and refuges in the mountains and along the river banks. In so doing, we will provide benefits in restoring a balance for the species in the ecosystem and the public within an urban setting.

Alternative 20 significantly increases the amount of habitat restored. Alternative 13 restores 588 acres of habitat compared to 719 acres restored in Alternative 20. More importantly, the quality of the restoration is significantly superior in Alternative 20 than in Alternative 13. As pointed out earlier, the creation of large habitat nodes is even more important than the total acreage of restoration. Alternative 20 provides almost three times the acreage of new large habitat nodes.

According to the estimated quantities for demolition of concrete presented in the Appendix C: Cost, Alternative 20 removes 117,918 cubic yards of concrete while Alternative 13 only removes 36,891 cubic yards. Thus, Alternative 20 removes 3.2 times more concrete than Alternative 13. Alternative 20 restores 6.4 miles of habitat or 58% of the ARBOR length, which is two times the length of habitat restored in Alternative 13 (3.2 miles or 29% of ARBOR).

#### E. Alternative 20 Fully Satisfies All Decision Criteria And Is The Most Effective

The Principles and Guidelines, as shown in Section 6.5.5 (Page 6-42), identified four decision criteria to be used in selecting measures and plans. The criteria are effectiveness, completeness, efficiency, and acceptability.

Alternative 20 *"is judged to be the **most effective** of the four final alternatives. It maximizes contribution toward achievement of the planning objectives, including key nodal connections for wildlife and habitat. It also maximizes the potential for near and long term RED and OSE benefits."*

Alternative 20 is the most complete by virtue of including the maximum connectivity to large land areas, the most acres for restoration, the most substantial and natural hydrologic connections, and the greatest length of restoration. These same factors render it the most resilient for long term benefits, survivability, and sustainability.

Alternative 20 is efficient and all features are cost effective. It is the most expensive but is essentially as cost efficient as Alternative 13. The higher cost is because Alternative 20 is truly the "game changer" for ecosystem restoration

Alternative 20 is the most acceptable alternative. All four alternatives are acceptable, but 20 most fully meets the requirement of the authorization in the Water Resources Development Act

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of 2007 to develop a plan *“that is consistent with the goals of the Los Angeles River Revitalization Master Plan published by the city of Los Angeles...”* Alternative 20 is also the plan that is most acceptable to the public because it is the farthest reaching restoration plan and provides the most benefits to the physical, cultural, and human ecology.

Comparing the ranking of the four criteria for the four final plans shows Alternative 20 to be ranked first in three of the four evaluation criteria with 1 being the best.

Table 5

Criteria	Alt 13	Alt 20
Effectiveness	3	1
Completeness	3	1
Efficiency	2	3
Acceptability	3	1

In summary, Alternative 20 has major additional benefits when compared with Alternative 13 which must be considered in a decision as to the preferred alternative::

- Removes three times more concrete;
- Doubles the length of restoration;
- Adds more than triple the value by including additional tributary and large expanses of open space into the plan;
- Includes about three times the area of essential large habitat nodes.
- Provides substantially more connectivity which remedies the extreme biological stress caused by urbanization, fires, floods, and climate change;
- Significantly improves societal benefits such as environmental justice, recreation, water quality, public health;
- Greatly widens the main channel and tributaries at key locations;
- Creates substantially more wildlife and hydrological connectivity.
- Is superior in its compatibility with the numerous initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the Los Angeles River to habitats, species and people.

The current trend of more people moving into cities worldwide gives Los Angeles the opportunity to be the model of how cities can create places for habitats and people in an urban setting, a type of holistic ecology. The City of Los Angeles continues increasing densities in the downtown area to reduce urban sprawl, reliance on automobiles, and reduction of air pollutants. Alternative 20 represents the last significant amount of open space and habitat found along the river and we must collectively and collaboratively preserve and restore it now. The approval of Alternative 20 could result in the Corps and the City developing the model for other major cities throughout the U.S. and the world in how to create places for meaningful habitat and people to coexist in ecological balance.

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As I was quoted in a Los Angeles Times Editorial: "The only remaining issue is whether the Army Corps will be content to go only halfway and leave the rest of the job to some future generation, or whether it will instead restore a greater amount of ecosystem and provide a greater amount of human accessibility, so that Angelenos now living will see the full benefit of the dreams, the plans and the work."

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We urge the Corps to select Alternative 20 as the final Federal plan. As Angelenos we will do our part to shoulder our cost-sharing responsibilities. This is the right plan for restoring the ecosystem values lost by the construction of the Los Angeles River and for the people of our great City.

Sincerely,

A handwritten signature in black ink, appearing to read "Lewis MacAdams", written in a cursive style.

Lewis MacAdams  
President



**From:** [Karin Flores](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** "Carol Armstrong"; [leweye@gmail.com](mailto:leweye@gmail.com); "Andrea White-Kjoss"  
**Subject:** [EXTERNAL] Press articles re: SPL-2013-003-NLH-Draft IFR for LA River Eco. Rest. Study  
**Date:** Monday, November 18, 2013 4:17:20 PM

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Hello,

Friends of the Los Angeles River (FoLAR) submits below, for the official record, links to press articles written about the Los Angeles River Ecosystem Restoration Integrated Feasibility Study. We provide this list in addition to our previously submitted technical comments.

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 Friends of the Los Angeles River  
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 Tel: (323) 223-0585  
[www.folar.org](http://www.folar.org)

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**GLASSELL  
PARK****IMPROVEMENT ASSOCIATION****WORKING TO BETTER OUR COMMUNITY SINCE 1968**

14 November 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Attn: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, California 90053-2325

Dear Dr. Axt:

I am writing on behalf of the Glassell Park Improvement Association, a long-time active voice for the betterment of our community, Glassell Park.

It is hard to imagine a greater improvement to our area than the restoration of our river, and we appreciate the many years of effort put forth by the U.S. Army Corps of Engineers to study and prepare such a detailed and thoughtful report.


While Glassell Park's southwest border lies alongside the River within the report's "geomorphic reaches" 5 and 6, which benefit from Alternatives 13, 16 and 20; we believe that only Alternative 20 can provide the highest level of connectivity--between wildlife habitats and hydrology, of course; but also, between people and communities--that is crucial for successful, sustainable restoration.

Glassell Park is an area of middle-income individuals and families, many of whom are members of minority groups. The jobs created by adopting Alternative 20 will greatly improve the lives of our neighbors.

Like many communities along the 11-mile stretch of the River that the report covers, Glassell Park has long been ignored or dismissed when plans for improvements come along. Finally, we are perfectly situated to participate in perhaps the greatest improvement of this generation.

Therefore, the Glassell Park Improvement Association encourages you to select Alternative 20. Not only is it the most comprehensive, the most inclusive, and the most effective plan, but it is far and away the most beneficial to the people & wildlife who live here.

Sincerely,



Alisa Smith,  
President GPIA

cc: Mayor Eric Garcetti  
Councilmember Gil Cedillo  
Councilmember Mitch O'Farrell  
Councilmember Jose Huizar

**From:** [Joanne Hedge](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L A River Restoration -Alt. 20  
**Date:** Monday, November 18, 2013 11:29:32 AM

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This is to urge that the Alternative 20 re Los Angeles River restoration by U S Army Corps of Engineers be adopted and implemented. I spoke at the microphone for the public record at the L A River Center event, and herein again urge same. Residents and city staff supported a decade of effort to bring the Glendale Narrows Riverwalk Park to fruition, whose river trailhead is steps from our home near the Riverside Drive Bridge (also due for retro fit in spring 2015), and that project would be enhanced for future users and generations by a comprehensive plan for the best conservational, recreational, and safety measures that 20 embodies.

Joanne Hedge, President  
**GLENDALE RANCHO NEIGHBORHOOD ASSOCIATION**  
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November 18, 2013

**JOSEPHINE R. AXT, PH.D.**

Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Comment Letter in Support of Alternative 20 of the U.S. Army Corps of Engineers Los Angeles River  
Ecosystem Restoration Integrated Feasibility Report

---

Dear Dr. Axt:

As the Founder and President of Great Ecology, a national ecological consulting and habitat design firm specializing in creating and enhancing the nation's public parks, wetlands, and waterfronts, I welcome the opportunity to comment on the U.S. Army Corps of Engineers (USACE) Draft Integrated Feasibility Report (DIFR) for the Los Angeles River Ecosystem Restoration Study. Great Ecology has reviewed the DIFR, released in September 2013, and offers this letter in support of Alternative 20 as the preferred alternative.

Although the USACE has identified a suite of potential alternatives to restore the LA River based on the goals set out in the Los Angeles River Revitalization Master Plan, it has indicated a preference for Alternative 13 as the most cost-effective alternative. Alternative 13, as it now stands, relies heavily on the cost-evaluation metric; however, it discounts the value and importance of the more robust ecological Alternative 20. In comparison, Alternative 20 offers optimal ecological functionality, deeper and wider connections to surrounding habitat and wildlife corridors, and the likelihood of real, long-term benefit for the Los Angeles community.

As an industry leader whose ecological designs are proven to deliver the highest ecological value at the least risk and cost to public and private clients nationwide, we offer our perspective in the remainder of this letter. In summary:

- Alternative 20 offers a holistic and synergistic approach that is more consistent with the Los Angeles River Revitalization Master Plan goals for enhancing ecological function, improving water quality and flood storage, and increasing connectivity.
- Alternative 20 is a robust, ecologically superior plan with wide reaching environmental and community benefits that extend far beyond the immediate boundaries of the LA River corridor for people, plants, and wildlife.
- The USACE analysis of the alternatives (using the CHAP approach) does not consider habitat connectivity and the expansion of in-channel habitat as significant factors in Habitat Unit valuation, and would benefit from incorporating a Graph Theory approach to more accurately capture the value of Alternative 20's enhancements.





## ALTERNATIVE 20 IS MORE CONSISTENT WITH THE LARRMP GOALS

The Los Angeles City Council adopted the Los Angeles River Revitalization Master Plan (LARRMP) in 2007 as a framework for restoration of the River to its former ecological, social, and commercial significance in the city landscape.<sup>1</sup> Multiple studies referenced in the LARRMP and the DIFR have documented that the River corridor and its surrounding area have suffered from urban development. The once abundant southwestern riparian ecosystems are now scarce; channelization has diminished biodiversity and natural hydrology regimes within the River; and interference with wildlife and aquatic corridors from man-made structures and pollution has fragmented habitats within the watershed. The LARRMP identifies specific goals for increasing ecological function, including enhancement of flood storage, improving water quality, and restoring a functioning riparian ecosystem.

The DIFR presents options to accomplish these goals and addresses additional problems identified by various studies conducted in and around the River. The ecological problems facing the LA River are interrelated. Alternative 20 takes a holistic approach and includes multipurpose design and management strategies that have the best chance of success. For example, restoration of natural flow regimes will bring needed water to the floodplain that allows for the establishment of native vegetation, which in turn will lead to an increase in flood attenuation capacity and a reduction in nutrient loads in the LA River. This vegetation will attract and host native riparian wildlife species that form the basis of a natural riparian ecosystem. The result of this multilayered approach will be an increase in the floral biodiversity on the LA River, which will facilitate the enhancement of faunal biodiversity.<sup>2</sup> Additionally, wide, contiguous stretches of restored riparian habitat represent ideal habitat corridors for wildlife movement, restoring connections between disconnected habitat nodes.<sup>3,4</sup>

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### **Alternative 20 is a holistic and synergistic approach with exponential benefits.**

Because Alternative 20's enhancement elements are interconnected, removing a piece of this restoration plan, or limiting the plan's scope, significantly diminishes its effectiveness. Doing so would also increase the risk of functional failure, add costs related to fixing failures, and decrease the likelihood that the River's restoration project will achieve all of its ecological goals.

## ALTERNATIVE 20—AN ECOLOGICALLY SUPERIOR PLAN

Alternatives 13 and 20 differ significantly in their plans for four of the eight reaches. Alternative 20 expands on the core elements of Alternative 13, providing enhancements that primarily involve restoring habitat connectivity and expanding in-channel and wetland habitat. A restored habitat, however, only functions if the flora and fauna it is intended to support are able to reach it. Alternative 20, with its emphasis on connectivity, offers additional elements that amplify the ecological benefits and significantly improve environmental performance of the River and the watershed.

<sup>1</sup> City of Los Angeles. 2007. Programmatic environmental impact report/environmental impact statement for the Los Angeles river revitalization master plan. Prepared by the City of Los Angeles, Department of Public Works, Bureau of Engineering and the U.S. Army Corps of Engineers, Los Angeles District, Planning Division, with technical assistance from Tetra Tech, Inc.

<sup>2</sup> Krueper, D.J. 1995. Effects of livestock management on southwestern riparian ecosystems. *In*: Desired future conditions for southwestern riparian ecosystems: bringing interests and concerns together. General Technical Report RM-GTR-272. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Forest and Range Experiment Station. 359 pp.

<sup>3</sup> Gilbert-Norton, L., R. Wilson, J.R. Stevens, and K.H. Beard. 2010. A meta-analytical review of corridor effectiveness. *Conservation Biology* 24:660-668.

<sup>4</sup> Beier, P., D.R. Majka, and W.D. Spencer. Forks in the road: choices in procedures for designing wildland linkages. *Conservation Biology* 22:836-851.

**Reach 2—Bette Davis Park area of Griffith Park**—Alternative 20 proposes additional restoration along the overbanks, soft bottom habitat creation through channel modifications, and restructuring the banks to support overhanging vines. This will enhance the hydrologic connectivity between the River and its floodplain by an additional six acres as compared to Alternative 13. Soft bottom habitat is the natural state of the River, and a vertical slope along the channel allows fish and other aquatic life to take advantage of shade provided by the proposed overhanging vegetation. This makes the river corridor a more desirable movement pathway.

**Reach 3—the Ferraro Fields area of Griffith Park**—The most significant Alternative 20 enhancement is a channel mouth widening in the Verdugo Wash confluence, which presents an opportunity for connection to a Significant Ecological Area in the Verdugo Mountains. These regional connections are vital to ensure the success of any revitalization effort as Significant Ecological Areas contain populations of species that will benefit most from restoration.

**Reach 7—the Arroyo Seco/LA State Historic Park**—Alternative 20 is the only alternative to propose a profound hydrological connection between the River and the LA State Historic Park. This area represents a refuge from the lower value urban environment, and provides important breeding and foraging grounds for any species traversing the River corridor.

1

Although Alternative 13 proposes to soften and stabilize feeder streams to enhance hydrologic connectivity in this reach, Alternative 20 also includes the creation of marsh habitat. Marshes not only serve as nutrient sinks and provide significant wildlife habitat, but also are critical floodwater attenuators for the downstream river reaches that face greater pressure from stormwater inflows, especially during storm events.

**Reach 8—Piggyback Yard**—Alternative 20 proposes major improvements that focus on connectivity, habitat expansion, nutrient removal, and flood management. The proposed river diversion into Piggyback Yard, turning the reach into soft bottom habitat and extending freshwater marsh habitat within this region, augments the Alternative 13 proposed restoration of an historical wash and biodiversity enhancements through planting.

**Ultimately, the more robust enhancements of Alternative 20 in these four reaches will yield wide reaching ecological and environmental benefits that extend far beyond the immediate boundaries of the LA River corridor, for people, plants, and wildlife.**

## USACE METHODOLOGY

In accordance with agency guidelines, the USACE subjected the ecosystem-related benefits of each alternative to a detailed economic analysis, allowing for an explicit comparison of costs and benefits. To this end, USACE used the Combined Habitat Assessment Protocol (CHAP) approach to quantify the environmental benefits of the various alternatives, and determined Alternative 13 to be the preferred option. The output from the CHAP approach is Habitat Units (HUs), which represent the per-acre value of a habitat. However, it is difficult to place a monetary value on many ecosystem services due to a lack of market value for them.<sup>5</sup>

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<sup>5</sup> Gómez-Baggethun, E. and M. Ruiz Pérez. 2011. Economic valuation and the commodification of ecosystem services. *Progress in Physical Geography* 35:613-628.

While the CHAP approach accounts for a many factors relevant to assessing the efficacy of certain restoration measures (e.g., it considers hundreds of species, habitats, and habitat functions to arrive at the HUs for each restoration measure), this methodology has key shortfalls noted by the USACE.<sup>6</sup> The HUs—the basis of the USACE’s Cost Effective/Incremental Cost Analysis—do not fully capture the value of specific habitat enhancement measures. The CHAP does not feature a weighting mechanism for more valuable in-channel habitat, and does not address hydrologic connectivity or habitat connectivity related to wildlife movement.

We recommend the use of a Graph Theory to address CHAP shortfalls in valuing connectivity. Graph Theory analyzes network connectivity and has gained traction in landscape management and planning literature in the recent decade.<sup>7</sup> It provides a mathematical, quantitative method to address spatial questions such as, *what conservation and restoration strategies will provide the most cost-effective and efficient way to connect two isolated populations of a species to one another?*

The DIFR specifically alludes to Graph Theory, referring to different parts of the restoration reaches as habitat *nodes* and discussing the importance corridor restoration in terms of movement potential. A typical analysis using Graph Theory assesses the nodes (i.e., habitat patches) and the paths (i.e., corridors) connecting them. The number of paths that pass through a node is dependent on certain criteria that make it more *desirable* for movement and the path *easier* for an individual to travel along. Ecological planners typically determine these criteria based on life history characteristics and basic habitat requirements for relevant species. This allows planners to add a weighting mechanism to account for the higher value of in-channel habitat within certain nodes or along paths.

Ultimately, nodes are ranked on the basis of how many paths cross through them; in this manner, one can assess the ease of movement (i.e., connectivity) between patches at multiple spatial scales. If USACE cannot incorporate graph theory into its CHAP approach, it should consider conducting a separate Graph Theory analysis and assessment to identify benefits of certain restoration measures beyond those simply identified by the CHAP HU analysis.

## CONCLUSION

**Alternative 20, the most ecologically robust plan, offers a true synergistic approach to restoring the LA River**—all of its design features and restoration strategies build upon one another and focus on multiple aspects of connectivity, biodiversity enhancement, flood control, and nutrient removal. Alternative 20 aligns seamlessly with the ecological goals established in the Los Angeles River Revitalization Master Plan, and provides more ecological performance at a lower risk of functional failure than what might be achieved by the more limited restoration scopes described in Alternative 13. With its enhanced emphasis on connectivity, Alternative 20 cultivates an urban ecological network that can facilitate wildlife (both terrestrial and aquatic) and human movement throughout the region by substantively linking to Significant Ecological Areas, such as the Verdugo Mountains, as well as signature public recreational spaces like the LA State Historic Park.

The USACE analysis of the alternatives (using the CHAP approach) does not consider habitat connectivity and the expansion of in-channel habitat as significant factors in Habitat Unit valuation. There are additional methods that can accurately value these vital factors. For example, incorporating a Graph Theory approach to assess connectivity and capturing the value of restoration actions. Had these methods been used, Alternative 20 would be deemed a more cost-effective alternative relative to the ecological benefits it will provide.

<sup>6</sup> U.S. Army Corps of Engineers. 2013. Draft integrated feasibility report. 505 pp.

<sup>7</sup> Saura, S. and L. Rubio. 2010. A common currency for the different ways in which patches and links can contribute to habitat availability and connectivity in the landscape. *Ecography* 33:523-537.

Economic considerations aside, **Alternative 20 unequivocally offers the most ecological value.** While Alternative 13 provides a suite of ecological improvements, it does not fully address connectivity in the region, and as a result, carries a greater risk of failure on the level of overall ecosystem function. Alternative 20, with a heavier focus on measures that enhance connectivity to outlying natural regions, represents the best alternative to fully revitalize the hydrological, chemical, biological, and ecological character of the LA River.

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We applaud the USACE's efforts and commitment to revitalize the LA River and appreciate your consideration of our comments.

Sincerely,



Mark S. Laska, Ph.D.  
President and CEO



Jeffrey T. Harlan, Esq., LEED AP  
Senior Planner



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November 14, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
Via email: comments.lariverstudy@usace.army.mil

Re: Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Feasibility Study and Environmental Impact Statement/Environmental Impact Report

Dear Ms. Axt,

On behalf of Heal the Bay, a non-profit environmental organization with over 15,000 members dedicated to making Southern California coastal waters and watershed safe, healthy, and clean for people and aquatic life, we submit the following comments on the *Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Feasibility Study and Environmental Impact Statement/Environmental Impact Report* ("Restoration Study"). We appreciate the opportunity to provide comments.

Heal the Bay has been intimately involved in efforts to restore beneficial uses to the Los Angeles River and its Tributaries for over two decades. Our Science and Policy staff routinely advocate for the development and implementation of policies and regulations to improve water quality and habitat in the Los Angeles River. For example, we were closely involved in the development of municipal and regional low impact development ordinances, and more recently, the reissuance of the Los Angeles Municipal Separate Storm Sewer System Permit ("MS4"), which includes numerous Total Maximum Daily Loads ("TMDLs") or pollutant limits for the Los Angeles River. In addition, Heal the Bay's education programs have engaged with community members in the Los Angeles River Watershed so that residents can better understand the value of maintaining a healthy Los Angeles River. Based on these experiences, Heal the Bay sees great value in drawing the much-needed attention to the Los Angeles River through the Restoration Study effort.

As stated in the Restoration Study, the primary purpose of the alternative plans is to restore ecosystem services to an 11-mile reach of the Los Angeles River. The secondary purpose is to provide recreational opportunities consistent with the restored ecosystem. Of the alternatives presented in the Restoration Study and keeping the stated goals in mind, Heal the Bay believes that Alternative 20 is the best option. Alternative 20 adds substantial freshwater marsh restoration in Piggyback Yard and restores larger riparian areas than several of the alternatives. Alternative 20 also includes restoration of riparian and marsh habitat at the Verdugo Wash confluence and Cornfields sites. Alternative 20 would provide more freshwater marsh habitat and more support for fish by reconnecting the channel directly to Piggyback Yard and restoring habitat. Alternative 20 would restore additional freshwater marsh at the Los Angeles State Historic Park. It would add to the life requisites for the endangered least Bell's vireo.





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However, we are concerned that none of the alternatives presented addresses improving water quality in the Los Angeles River. In fact, the Restoration Study says that any water quality improvements are only “ancillary” to the project. Heal the Bay strives to ensure that our local waterbodies including the Los Angeles River are safe, healthy, and clean for people and aquatic life. State and Federal agencies such as the Los Angeles Regional Water Quality Control Board and the United States Environmental Protection Agency also have a goal of improving the water quality of the Los Angeles River to meet standards and have established regulations that require water quality improvement. As a result, municipalities around Los Angeles County are currently focused on developing suites of projects to improve water quality and augment local water supply. The Restoration Study misses an important opportunity to comprehensively manage the Los Angeles River resource and leverage the efforts of the MS4.

2

There has been a movement in California over the last decade to manage water resources in a more “integrated” manner and at the watershed-scale to help leverage funds and create the greatest positive change. Traditional water management planning did not always adequately consider the impacts on communities and the surrounding environment. The old planning paradigm also did not consider the relationship between wastewater, water and storm water, and the potential for mutually beneficial approaches in the context of watershed planning. Unfortunately, the goals and alternatives set forth in the Restoration Study do not take an integrated, “full picture” look at the Los Angeles River Watershed.

We are also concerned that climate change adaptation is not adequately considered in the Restoration Study. Climate change adaptation is gaining attention in the realm of water management, as storm intensity and frequency are likely to change and our imported water supply is placed at risk. Climate change projections also put riparian habitat under threat. Climate change adaptation analyses have been conducted to inform other long-term restoration projects in the region, such as the Ballona Wetlands Restoration Project, for which a climate change assessment was conducted to inform restoration design. We also see efforts underway in Los Angeles, such as Adapt LA and Los Angeles Regional Collaborative for Climate Action and Sustainability, to help our region better prepare for climate change. Again, these efforts could be leveraged in terms of the Restoration Study.

3

In sum, goals to enhance water quality, augment local water supplies and address climate change adaptation potential are glaringly absent. Alternative 20 is a start, but our decision-makers need to push us further to meet all of these goals and truly put the Los Angeles River Watershed on the path to meeting beneficial uses. Additional questions and concerns with the Restoration Study are as follows:

*Flow*

Reducing peak flow should be a component of the Restoration Study. The Restoration Study states: “The alternatives requiring the most extensive and expensive engineering interventions, such as the creation of underground detention/retention basins or very large bypass culverts or tunnels, were determined to be infeasible because of their cost and because they only

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exacerbated or moved the problems with the current channelized system and deferred important decisions about what needs to occur regarding peak flow reduction in the river's watershed." The Restoration Study also discusses altered hydrology that increases runoff is a primary stressor on habitat. Further, the Restoration Study acknowledges that current climate change studies have indicated a likely increase in the frequency of extreme weather conditions in the future and that these extreme weather events could compound and increase watershed peak flows (5-41). How do the project alternatives address peak flow reduction? Designing a project that maintains the same flood management regime does not fully address impacts to the Los Angeles River.

4

### ***Stormwater***

The Restoration Study has outdated information regarding local regulations that should be updated (5-39). The MS4 was reissued in December 2012. It includes a program for developing Watershed Management Plans and Enhanced Watershed Management Plans that should be considered in the context of the Restoration Study. In addition, the MS4 includes all TMDLs in effect for the Los Angeles River Watershed.

5

### ***Construction Period***

The Restoration study states that "It is assumed that instream construction and modification of the project reaches would be conducted in dry weather months (April 15 - October 31) to avoid wet weather storm flows, or that work areas would be adequately protected and not affect flood conveyance." (5-42). Project proponents should state definitively that construction will only take place in the dry weather months to minimize impacts, including downstream impacts. Have potential impacts due to a decrease in flows from potential construction-period diversions been evaluated (both in the project reaches and downstream)?

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### ***Maintenance***

Currently with many ACOE "maintenance" projects we see a complete disregard for habitat and beneficial uses when conducting these activities. In fact, on October 31, 2013 the Los Angeles Regional Board issued a Notice of Intent to Sue to the ACOE for unpermitted disturbance of beneficial uses and impacts to water of the state. The Restoration Study states that "current [maintenance] operations would be expected to continue into the future without the implementation of the proposed project. Authorized maintenance includes clearing of all vegetation and scraping of the channel to maintain the purpose of flood risk management, which may be implemented in the future as funding allows... Without implementation of the proposed project, removal of all vegetation in the channel would remain an authorized maintenance activity." (5-48). There are several issues with this statement. First, why does ACOE find it prudent to pursue this type of maintenance operations in the Los Angeles River or elsewhere, as it is in complete conflict with the goals of this restoration project that ACOE is asking stakeholders and government funders to support? Second, how do we ensure that current channel clearing practices aren't utilized after this billion dollar restoration effort? Finally, who will fund the maintenance in perpetuity to ensure the restoration efforts hold?

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### ***No Action Alternative***

The Restoration Study states that “Under the No Action Alternative, poor water quality and quantity issues will continue to degrade the existing river ecosystem. The excessive trash that accumulates within existing habitat will not be removed, and will continue to degrade riparian and wetland habitats. Most dry season flow in the channel is due to wastewater releases from the upstream Tillman Treatment Plant or runoff from irrigation or industrial practices. If the climate of Southern California becomes drier, as some climate models predict, pressure on any available water supply will increase. Over time, this could result in greater water conservation measures as well as reuse of treated wastewater, which would reduce flows in the channel. Reduced flows could result in diminished wetland and riparian habitat as well as open water habitat. With degraded habitat conditions and invasion by non-natives, use of habitats by wildlife species is also expected decline.” This statement does not appear fully substantiated. First, how do any of the proposed alternatives directly address water quality and trash issues? Also, what is the source used to assert that that reduced flows from Tillman due to water recycling would negatively impact habitat? We have not seen any studies that identify a volume of water discharge necessary to maintain habitat in the River. This is another area where integrated water management is important.

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While we see moving forward with Alternative 20 as a step in the right direction, we are alarmed that other critical water management concerns such as water quality, water supply and climate change adaptation were not considered concurrently to leverage this opportunity. We hope that ACOE will work with agencies and stakeholders to address these other concerns and potential opportunities for collaboration. Thank you for your consideration of these comments.

Kirsten James  
Science and Policy Director, Water Quality

**HISTORIC HIGHLAND PARK NEIGHBORHOOD  
COUNCIL**

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Certified as NC #33 May 28, 2002

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**CITY OF LOS ANGELES  
CALIFORNIA**



DEPARTMENT

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November 8, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
ATTN: Ms Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

At a regular meeting of the Historic Highland Park Neighborhood Council, the board voted to submit the following resolution regarding U.S Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report:

WHEREAS, the Los Angeles River is the lifeblood of our community and a vital resource to be restored and protected; and

WHEREAS, in 2006, the Los Angeles City Council approved an agreement with the US Army Corps of Engineers (Corps) for the Los Angeles River Ecosystem Restoration Feasibility Study (Study); and

WHEREAS, in 2013, the Corps has developed a final array of four alternatives for the Study, and only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing a profound hydrological link between the Los Angeles State Historic Park and the river; and

WHEREAS, these two areas provide critical wildlife habitat connectivity to the Verdugo and Elysian Hills, respectively, and are included in the five key opportunity areas of the City Council-adopted Los Angeles River Revitalization Master Plan, which the US Congress directed the Corps to consider; and

WHEREAS, *Alternative 20* provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from the river's channelization—providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles

***NOW, THEREFORE BE IT RESOLVED, that the Historic Highland Park Neighborhood Council supports the selection and full implementation of Alternative 20 by the United States Army Corps of Engineers to restore our Los Angeles River.***

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Alcaraz".

Monica Alcaraz, President  
Historic Highland Park Neighborhood Council



November 12, 2013

Josephine Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

*Sent via Email to: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)*

**Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

i2 Capital Group is an impact investment merchant banking firm with a mission to finance businesses with positive environmental or social impact. We would like to pledge our support for Alternative 20 of the US Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (Study), as we believe it offers the greatest potential for catalyzing long-term benefits to the City of Los Angeles and its environment.

As the Study indicates, Alternative 20 would provide over 9,000 direct jobs and add more than \$1 billion direct dollars to the gross national product of the region. Moreover, the Study estimates that, including effects from redevelopment, over 16,000 jobs and nearly \$5 billion will result. Alternative 20 also reflects a more equitable cost-sharing partnership—with the local sponsor paying approximately 50% versus Alternative 13, which requires the local sponsor to pay almost 70%. As a representative of the private finance sector, we see Alternative 20 as the most attractive for generating attention from this community.

We look forward to being a partner in that transformation.

Sincerely,



Ashley M. Allen  
Founder and Chief Executive Officer  
i2 Capital Group, Inc.



November 14, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, California 90053-2325

RE: Los Angeles River Ecosystem Restoration Feasibility Study, Alternative 13

Dear Dr. Axt:

Kaiser Permanente is aware that the Army Corps of Engineers and community organizations are working to reclaim natural habitat in the Los Angeles River. Kaiser Permanente supports efforts to restore and conserve the natural environment. We understand that the plans for this beneficial project are in their preliminary stages. While the possible restoration of the river is positive news, Kaiser Permanente would like to express concerns regarding an aspect of the Los Angeles River Ecosystem Restoration project's Alternative 13.

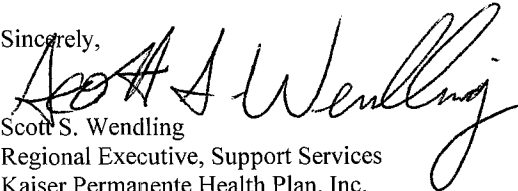
The reason for our concern is the reference to Kaiser Permanente's Regional Service Center, located at 4580 Electronics Place, Los Angeles, CA 90039. According to the map on page 450 of the report, a strip of undeveloped land at the rear of Kaiser Permanente's property is suggested as a temporary construction staging area during the project.

There are two primary concerns with regards to the possible use of this property by construction crews during river restoration construction. First, the Regional Service Center houses eyeglass manufacturing operations and our regional Genetics Laboratory which handles specialty laboratory specimen processing, both which require precision instrumentation. In addition, our Medical Imaging Testing Laboratory, also located at this address, tests all mobile imaging systems, testing on average 20 systems each week.

The Regional Service Center employs 228 employees who produce 1,300 pairs of eyeglasses and perform about 460 genetic laboratory tests every day—seven days a week, 365 days a year. Over 70 pieces of testing equipment and over 100 auxiliary pieces of equipment run every day to meet the needs of our members. The potential of vibrations and dust from large construction equipment being staged, and potentially frequently moved, could affect our overall operations and so, our 3.6 million Southern California members who rely on us for these products and services.

Secondly, Kaiser Permanente has not determined a permanent use for this undeveloped land along the river which could impact Kaiser Permanente if a need were to arise for our use of this property during the time period for the river restoration construction.

Kaiser Permanente will continue to monitor this project and, as the plans evolve, we will continue to offer input regarding possible negative impacts at the Regional Service Center. Rita Speck, our Regional Director of Government and Community Relations, can be reached at (626) 405-5533 and welcomes the opportunity to discuss this issue with you. Thank you for your consideration, and we look forward to hearing from you soon.

Sincerely,  
  
Scott S. Wendling  
Regional Executive, Support Services  
Kaiser Permanente Health Plan, Inc.  
Southern California Region

cc: The Honorable Mitch O'Farrell, Los Angeles City Councilman  
John Yamamoto, Kaiser Permanente, Vice President & Regional Counsel  
Skyler Denniston, Kaiser Permanente, Land Use Manager  
Rita Speck, Director, Kaiser Permanente Government & Community Relations  
Michael Cook, Director, Kaiser Permanente Regional Operations & Property Management

**From:** [Eric Bruins](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LACBC supports Alternative 20  
**Date:** Monday, November 18, 2013 3:07:33 PM

The Los Angeles County Bicycle Coalition (LACBC) supports Alternative 20. We believe in a bold vision for the future of Los Angeles that integrates open space, recreation, transportation, and restoration in a revitalized Los Angeles River corridor. Our comments were included in [KCET's coverage](#) of the ARBOR study:

**Eric Bruins, planning and policy director for the Los Angeles County Bicycle Coalition (LACBC)**

[We're supporting] Alternative 20 (the most advanced). The L.A. County Bicycle Coalition isn't shy about dreaming big. Just as we're reimagining how Angelenos get around, we recognize the need to reimagine our relationship with the L.A. River. And just as with our streets, half-measures don't cut it if you want the full benefits of new investments.

How would the Alternative you've chosen affect the organization?Á

LACBC's annual River Ride is one of the signature events that happens along the river. Each June, over 2,000 bicyclists explore the river from Griffith Park to Long Beach, traveling through the lush Glendale Narrows, dystopian industrial zones, beautiful riverfront parks, and the brilliantly restored Dominguez Gap wetlands along the way. Our riders truly see the best and worst of the river and the diversity of communities along the way.

For this year's 13th Annual River Ride, we partnered with the River Revitalization Corporation to announce Greenway 2020, a campaign to make all 51 miles of the river, from Canoga Park to Long Beach, walkable and bikeable. We look forward to celebrating at our 20th Annual River Ride when our century route will truly include the entire river. Alternative 20 best captures this vision for a different L.A. River, one that connects L.A.'s communities with opportunities to walk, bike, and enjoy nature without leaving the city.

What would you say to the Army Corps backing Alternative 13 (ACE) option?Á

Now is not the time to be timid. We have one chance to get river restoration right, and this is it. *As there an issue you think the Army Corps should have focused more on in the study?*

Ecosystems in urban areas have incredibly high value for the services they provide. It's not all about acreage when the acres here can cleanse stormwater, attenuate flooding, and absorb air pollutants, all while providing respite to city dwellers. We can mitigate environmental injustices while meeting the Corps' mandate for habitat restoration. Alternative 20 will restore human habitat for Angelenos.

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Eric Bruins  
Planning & Policy Director  
Los Angeles County Bicycle Coalition  
t: 213.629.2142, x127 / f: 213.629.2259

[www.la-bike.org](http://www.la-bike.org)



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**From:** [Charles DeRosa](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Anthea Raymond](#); [Paul Macey](#); [Katherine Macey](#)  
**Subject:** [EXTERNAL] Los Angeles Kayaking Club for Alt. 20  
**Date:** Wednesday, November 13, 2013 3:58:08 PM

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Dear Dr. Axt.

My name is Charles DeRosa. I live in the Echo Park neighborhood of Los Angeles about half a mile from the Glendale Narrows stretch of the Los Angeles River. Personally, I'm an American Canoe Association (ACA) Certified River Kayaking Instructor and Swift Water Rescue Technician. I've been whitewater kayaking for over 20 years and spent seven years leading whitewater trips and teaching students for the Nantahala Outdoor Center in Bryson City, North Carolina. I am writing to you on behalf of the Los Angeles Kayaking Club (LAKC) and its 110 members. I assure you that the LAKC members have a deep seated interest in what is best for the Los Angeles River and are dedicated to creating a better balance between our river environment and urban community.

I attended the community meeting with the Corps on October 17 and would like to reiterate the appreciation we all have for the time and work that the Corps has put into the river project. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration. I have reviewed the report in detail and I am providing **comments in support of Alternative 20** presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative ~~to lack the comprehension~~ in key areas essential for adequate ecosystem restoration of the **Bloom** river.

Beyond the ecosystem concerns I would like to also address the issue of passive recreation on the Los Angeles River, a topic in which kayakers have a vested interest and expertise. Specifically, I feel any undertaking to improve the LA river should strive to create an environment conducive to facilitating the public's interaction with the river's ecosystem. Alternative 20 is (as the IFR points out) clearly the best road forward in terms of providing the people of Los Angeles with a meaningful recreation experience. Additionally, Alt 20's investment in river reclamation will provide an increased draw to people traveling to the LA area, resulting in increased economic activity for the local community.

As a kayak teacher I assure you that few pursuits increase environmental education opportunities to a river the way kayaking does. Kayaking the Los Angeles river is a unique experience and provides a virtually impact free immersion into the river's ecosystem. Therefore, I want to vigorously urge the Corp to select Alt 20 as the best plan for the Los Angeles river. Alt 20's investment in restoring ecological processes, biological diversity and natural hydrology are undoubtedly worth the increased cost. Simply put - the larger investment in the LA river provides greater opportunities for eco-immersion. The Verdugo Wash improvement, Arroyo Seco's restored riparian habitat, and Reach 2's additional modifications all would be of considerable benefit to the whitewater community. **Alt 20's investment in ecosystem, combined with a robust passive recreation program, is the right solution for restoring an environmental, communal and cultural resource to the people of Los Angeles.**

Sincerely,  
 Charles DeRosa  
 Los Angeles Kayaking Club  
 American Canoe Association Instructor

---

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**LOS ANGELES RIVER ARTISTS AND BUSINESS ASSOCIATION**

To: Dr. Josephine R. Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
and [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil).

CC.: Lewis MacAdams, FOLAR  
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Omar Brownson, LA River Revitalization Corporation  
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[obrownson@larivercorp.com](mailto:obrownson@larivercorp.com)

Martin Schlageter, Policy Director for Councilman Huizar, 14<sup>th</sup> District  
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200 N. Spring St., Room 465  
LA, CA 90012  
[martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org)

Dear Dr. Josephine R. Axt,

The Los Angeles River Artist and Business Association (LARABA) supports Alternative 20 of the recently released ARBOR Feasibility Study by the Army Corps of Engineers because it provides the most extensive yet cost-effective restoration of our area. The 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles directly borders on the Arts District area at 1<sup>st</sup> Street where we live and work.

Alternative 20 while maintaining existing levels of flood risk management includes a much needed connection to the LA River in the State Historic Park as well as 30 acres of Verdugo Wash, and extensive reparation of what can become a large, mixed-use parkland and newly added floodplain in the PiggyBack Yards area.

In our area, we are working toward connections along the river in walking/cycling paths that, in turn, can extend the intentions of the ARBOR study area by linking the downtown area south of 1<sup>st</sup> Street to existing LA River pathways upstream from us. We see the results of the ARBOR Study as exciting support toward those efforts.

**LOS ANGELES RIVER ARTISTS AND BUSINESS ASSOCIATION**

The Los Angeles River Artist and Business Association (LARABA) is a 22-year-old community betterment association for the Downtown Arts District. The Los Angeles River forms our eastern border, the ARBOR reach at 1<sup>st</sup> Street is our northern border, and so our community strongly favors restoring habitat for a usable river and adjacent green space.

Cost is a factor in today's constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the Los Angeles River to multiple large corridors and refuges in the mountains and along the river banks. In so doing we will restore a balance for the species in the ecosystem and the public within an urban setting.

**We urge support for Alternative 20.**

Sincerely,

A handwritten signature in black ink, appearing to read "J. Pitruzzelli". The signature is fluid and cursive, with a long, sweeping underline.

Joseph Pitruzzelli, President of LARABA

Deborah Meadows, co-chair of LARABA's LA River committee

Yuval Bar-Zemer, co-chair of LARABA's LA River committee



LA River Expeditions: the original Wild & Scenic Rivers of the West. www.lariverexpeditions.org

November 10, 2013

Josephine R. Axi, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
ATTN: Ms Erin Jones, CESPI-PD RN, P.O. Box 532711  
Los Angeles, CA 90053-2325

RE: Support for Alternative 20

Dear Dr. Axi:

We've been fortunate these last couple years to have Army Corps staff in Los Angeles who have opened up a new chapter in terms of how the Corps approaches the LA River situation.

I urge you and the senior staff in D.C. to align yourselves with the spirit of that activity and to do everything reasonably possible to support Alternative 20, the most robust of the options that have been presented. We understand that Alt 20 was not even the most expensive of the plans proposed by experts in the environmental community, but it seems to be a bold plan nonetheless that will more dramatically alter the river's fate and lead us toward being an increasingly sustainable city — which we see not as a choice of luxury but one of necessity.

We like that this option allows for an equitable share of the expenses between local and federal funding. We're not asking for handouts.

We also like that it resonates with what most Angelenos are saying they want, and we know this not from guessing but from what we've heard while working with the Corps as a partner and leading thousands of people on guided kayaking trips on the river over the past three years. Allowing increased access has proven to not only create jobs and utilize the public commons better (we're the largest park-starved big city) but also to have statistically decreased crime in the areas where recreational-educational activities have been given the opportunity to flourish. Instead of worrying about the bottom-line sticker price of this type of building project, we'd prefer that you and yours focus on the actual and societal costs of inaction; in hindsight, even ten years from now, the cost of Alt 20 will be seen as a small price to pay for all the benefits it can bring.

And finally, success in Los Angeles isn't just a provincial benefit — the LA River's iconic status (lowly as it has been at times) is a powerful symbol nationally and internationally. If we can succeed in an ambitious planned revitalization, then there is really no waterway in the world that couldn't take inspiration from our situation here and use it to improve their own waterway — and USACE can then take great pride in shaping those perceptions and creating positive change in the world. This kind of rags-to-riches story has win-win written all over it.

Regards and thanks for your consideration in this matter!

*Erin Jones*

Executive Director

LA River Expeditions

www.lariverexpeditions.org

770.882.0151



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November 13, 2013

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Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt and fellow Army Corps of Engineers,

We are writing you today to strongly encourage the selection and implementation of Alternative 20 of the U.S. Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 would ensure that the LA River is a civic legacy of the 21st century and create a publicly accessible, cherished, and celebrated public space for Los Angeles and the region. This is the only option that will allow access to our terraced banks, and a hydrologic link to LA Historic Park -- opening access to our downtown green space, inspire our imaginations, build positive community investment and grow our regional economy.

Though the Corps' selected Alternative 13 in its Draft Report, we believe Alternative 13 is unacceptable, as it does not meet the range of the Corps' study objectives. We further believe that Alternative 13 is substandard, underperforms for the investment, and should be set aside. This is a once-in-a-lifetime opportunity to create a public destination for future generations, and Alternative 13 squanders that opportunity.

In addition to restoring the environment, fuller restoration of the river as provided by Alternative 20, will create a recreational destination, and again allow the community to gather and enjoy the river, improving the quality of life for residents. When we fully restore a wildlife habitat, we are also building healthier spaces to improve quality-of-life--where families can ride bikes, play in parks, and breathe fresh air along the open water. Only Alternative 20 will fully realize the River's potential to bring green space to park poor, underserved neighborhoods because of the link to the LA Historic Park serving downtown and Chinatown. We must bring environmental justice to our community and Alternative 20 does that.

The chosen Alternative 13 inadequately meets the Study's full objectives of ecosystem restoration and economic development. According to the Corp's own analysis, full restoration of the river, represented by Alternative 20, will provide 16,833 economic redevelopment jobs versus 4,014 jobs for Alternative 13. Further, Alternative 20 provides \$4.7 billion in economic redevelopment income versus \$1.2



Billion for Alternative 13. Alternative 20 is head and shoulders above Alternative 13 in every possible category and must be embraced.

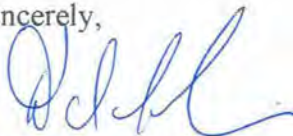
The Corps Plan must also include restoration of the Verdugo Wash Confluence, Taylor Yard/Bowtie, Taylor Yard/G-2, the Arroyo Seco Confluence, and the Piggyback Yard, all of which are broadly supported by the community and will enable us to reverse the rapid loss of biodiversity and provide sustainable habitat restoration and open space for the city. Only Alternative 20 includes the Verdugo Wash Confluence, which links the LA River to the Verdugo Mountains -- a valuable wildlife corridor that has been lost since the river was channelized and provides the only habitat capable of supporting restoration for the federally endangered Least Bell's Vireo.

We are also asking the Corps to expedite completion of the Chief's Report by June of 2014, rather than September, given the need to authorize the project and move forward with construction.

Given the Administration's selection of the LA River as one of 7 areas chosen in the first-phase of the Urban Waters Federal Partnership, which seeks to implement the Americas Great Outdoors Initiative, the Corps must select a plan that fully restores the river, which is the only option for meeting the goals of the Administration's AGO to stimulate regional and local economies, create local jobs, improve the quality of life, and protect Americans' health by revitalizing urban waterways in under-served communities.

Thank you for your consideration of Alternative 20, which, we believe, provides the best possible return to the American people.

Sincerely,



Daniel Tellalian  
Board Chair



Omar Brownson  
Executive Director

CC: Valerie Jarrett

Senior Advisor and Assistant to the President Office of Public Engagement and Intergovernmental Affairs Eisenhower Executive Office Building

Lieutenant General Thomas Bostick, Commanding General and Chief of Engineers  
Jo-Ellen Darcy, Assistant Secretary of the Army (Civil Works)

**From:** Omar Brownson [mailto:info@larivercorp.com]  
**Sent:** Tuesday, September 24, 2013 09:04 AM Pacific Standard Time  
**To:** Demesa, Eduardo T SPL  
**Subject:** [EXTERNAL] Demand a Destination Worthy of this City

Eduardo --

We work every day to change the course of LA. But right now, we have a unique opportunity to have our voices heard and make real change.

[Last week](#), the U.S. Army Corps of Engineers, selected Alternative 13, the second cheapest of four options detailed in the much-anticipated Los Angeles River Ecosystem Restoration Study. This option is not the best choice for the ecosystem restoration and economic development needs along our river. We don't want to make incredible investments in the river and then still have incredible barriers to accessing it.

Alternative 20 is the only option that will create a publicly-accessible, cherished, and celebrated natural resource in our world-class city.

The [Los Angeles Times Editorial Board](#) agrees it is inadequate and wrote their support for an alternative that includes terraced walkways. And Patagonia gave a \$5,000 donation to build a grassroots movement for the best alternative from the Army Corps study. Let's match their support.

[Click here to donate \\$5 or more to help the Los Angeles River Corp in our work to demand an alternative that would inspire our imaginations, build positive community investment and grow our regional economy.](#)



The Army Corps' LA River Ecosystem Restoration Study's 11-mile scope from Griffith Park to Downtown is a vital component of LA River Corp's Greenway 2020 movement to complete a continuous 51-mile Greenway adjacent to the LA River.

If we restore the Los Angeles River to the full potential of Alternative 20, we will be miles closer to a destination worthy of Los Angeles that everyone can access and enjoy.

**You can show your support by coming out this Saturday to learn more about the LA River Alt 20 study or [sign our petition here.](#)**

Thank you for your ongoing support. It means the world to us.

Omar Brownson

P.S. To submit for public comment, write in your support [here](#).

-- --

LA River Revitalization Corporation · 570 W Ave 26, Suite 475, Los Angeles, CA 90065,  
United States

This email was sent to [eduardo.t.demesa@usace.army.mil](mailto:eduardo.t.demesa@usace.army.mil). To stop receiving emails, [click here](#).  
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November 18, 2013

Josephine R. Axt, Ph.D., Chief  
Planning Division, U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

VIA EMAIL: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

RE: Comments on the DRAFT Los Angeles River Ecosystem Restoration Integrated Feasibility Report

Dear Ms. Axt:

Thank you for the opportunity to provide comments on the Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report ("ARBOR Study"). These comments are submitted on behalf of Los Angeles Waterkeeper ("Waterkeeper")<sup>1</sup> and our hundreds of California members and supporters who have a vital interest in restoring and protecting the Los Angeles River for the improvement of ecosystem and community health.

Waterkeeper commends the U.S. Army Corps for moving forward on a plan to restore the Los Angeles River. We have long supported the City of Los Angeles' River Revitalization Master Plan, and the efforts of numerous municipalities and organizations to implement green infrastructure and stormwater control projects along and near the LA River. Our organization has also worked hard over its 20 years to reduce industrial and municipal pollution from contaminating the river through our advocacy for strong pollution limits and Clean Water Act enforcement actions. Waterkeeper supports the most extensive restoration alternative currently in the ARBOR Study – Alternative 20. We believe this alternative provides the most comprehensive opportunity to transform the 11 miles of river into a thriving ecosystem that supports fish and wildlife, while providing enormous community benefits for recreation, fishing, and health.

Despite our support of Alternative 20, however, we do have concerns with the limited scope and evaluation included in the ARBOR study. In particular, the lack of focus on potential water quality impacts and benefits<sup>2</sup> in this project seems shortsighted. Rather

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<sup>1</sup> Founded in 1993, Waterkeeper's mission is to ensure water quality protections in waterways throughout L.A. County through enforcement, fieldwork, and community action. [www.lawaterkeeper.org](http://www.lawaterkeeper.org).

<sup>2</sup> Although the ARBOR study mentions water quality in several places, it explicitly states that "[t]his project is not proposing measures to address water quality; any improvements will be ancillary to the project." ARBOR Study at 2-20.





than avoiding or ignoring water quality impacts assessment, the ARBOR study should embrace the goal of water quality improvement as one of the cornerstones of the LA River revitalization and restoration. In fact, to do otherwise will undoubtedly represent yet another missed precious opportunity to help the river and Angelenos.

The current state of the LA River is defined not only by its concrete siding and lack of adequate vegetation and habitat, but also by the polluted runoff and discharges that plague it every day. It is impossible to evaluate the river's current health and discuss restoration without taking a hard look beyond the riparian zone at the land uses that surround it and those uses' impact on water quality.

The LA River, like all water bodies throughout Los Angeles, is designated as impaired under the federal Clean Water Act because its water quality does not meet state and federal water quality standards.<sup>3</sup> As a result, the river is unable to support its beneficial uses, which serve both human recreation and ecosystem functions.<sup>4</sup> Although pollution and channelization have drastically altered the natural ecosystem, LA water bodies like the Los Angeles River, are still essential habitat for dozens of fish and bird species, as well as macro-invertebrate and invertebrate species. In addition, the public's use of LA waterways for water contact recreation, including kayaking, and fishing exposes many people to fecal bacteria, including *E. coli*, toxic metals, nutrients and other contaminants. Non-contact recreational and aesthetic opportunities, such as wildlife observation, are also impaired by polluted discharges.

Alternative 20 provides the greatest opportunity for water quality improvements by maximizing tributary connectivity and expanding freshwater marsh restoration in some of the more industrial urban runoff impacted sections of the river. Providing freshwater marshes and connection to the major tributary Verdugo Wash will recover ecosystem services including water purification and filtration. Freshwater marshes protect water quality by trapping sediment and retaining excess nutrients and other pollutants common

<sup>3</sup> 42 U.S.C. § 1313(d).

<sup>4</sup> The Los Angeles Regional Water Quality Control Board ("Regional Board") issued the *Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura County* ("Basin Plan"), which identifies the "Beneficial Uses" of the portions of the Los Angeles River. These Beneficial Uses include: water contact recreation (REC 1), non-contact water recreation (REC 2), warm freshwater habitat (WARM), wildlife habitat (WILD), wetland (WET), estuarine habitat (EST), freshwater habitat (FRSH), marine habitat (MAR), commercial fishing (COMM), industrial (IND), rare, threatened, or endangered (RARE), migration of aquatic organisms (MIGR), and spawning, reproduction and/or early development (SPWN). See Basin Plan, Table 2-1. According to the 2010 303(d) List of Impaired Water Bodies, different Reaches and tributaries of the Los Angeles River and the LA River Estuary are impaired for pollutants such as copper, lead, Zinc, pH and oil. Polluted discharges from these facilities cause and/or contribute to the degradation of these already impaired surface waters and aquatic dependent wildlife. Other impaired waterbodies in the City of Los Angeles include Santa Monica Bay, Compton Creek, Ballona Creek and Ballona Estuary, Dominguez Channel, Los Angeles Harbor and Long Beach Harbor, and San Pedro Bay and its beaches.





in urban LA runoff such as heavy metals. These functions are especially important when surface waters are connected to ground water or waters used for swimming, fishing, and drinking and in turn these functions are critical for healthy fish and wildlife habitat.

Some of the worst threats to surface water quality in LA are pollution from industrial facilities such as scrap metal recycling yards, waste transfer stations, auto dismantlers, and sites that use preproduction plastics. Hundreds of these facilities are located in the Los Angeles River Watershed, including the area considered in the ARBOR Study. For example, the Piggyback Yard is surrounded by rail-associated industrial uses. Any restoration and revitalization efforts should include green infrastructure that helps reduce industrial runoff and addresses pollution at its source, instead of channeling it directly towards the river via the region's elaborate storm drain system. Similarly, the area around the Los Angeles State Historic Park/Chinatown presents opportunities for cleaning up nearby industrial activities. The ARBOR Study can and should focus on water quality improvements for these two areas and should evaluate water quality impacts associated with the restoration of the river.

2

In the past, our region has taken the approach of addressing one problem at a time. We have addressed challenges such as flood control, transportation, water supply, ecosystem restoration and water quality, separately. A piecemeal approach has often resulted in the solution for one issue causing problems for another. For example, the impressively engineered flood control system in LA has become a one-way conduit for pollutants and otherwise useful water resources to the ocean, while simultaneously importing freshwater from hundreds of miles away. Similarly, concentrating efforts on importing water from faraway places has diverted focus from developing efficient and clean local sources of drinking water here in LA. The only path forward is to integrate our approaches to water management and community development in Los Angeles. The restoration of the Los Angeles River presents a tremendous opportunity to transform that vision into reality.

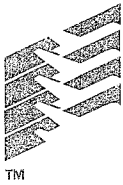
Waterkeeper urges the Army Corps to adopt Alternative 20 and consider and *prioritize* approaches that result in multiple benefits, including water quality, as it moves forward in restoring the Los Angeles River.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Liz Crosson".

Liz Crosson  
Executive Director  
Los Angeles Waterkeeper  
liz@lawaterkeeper.org



Los Angeles  
World Airports

LA World Airports

October 31, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers-Los Angeles District  
P.O. Box 532711  
Los Angeles, California 90053-2325

LAX

LA/Ontario

Van Nuys

City of Los Angeles

Eric Garcetti  
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Board of Airport  
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President

Valeria C. Velasco  
Vice President

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Jackie Goldberg  
Beatrice C. Hsu  
Matthew M. Johnson  
Dr. Cynthia A. Telles

Gina Marie Lindsey  
Executive Director

Re: **Los Angeles River Ecosystem Restoration Feasibility Study  
Draft Integrated Feasibility Report (Feasibility Study/Environmental Impact  
Statement/Environmental Impact Report)  
Los Angeles County, California**

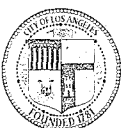
Dear Dr. Josephine Axt:

Los Angeles World Airports staff from the Environmental Services Division (ESD) has reviewed the Los Angeles River Ecosystem Restoration Feasibility Study Draft Integrated Feasibility Report. We understand that the Draft Integrated Feasibility Report (IFR) for the Los Angeles River Ecosystem Restoration Feasibility Study evaluates alternatives for the purpose of restoring 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles while maintaining existing levels of flood risk management; and that this project does not have any impact on LAWA airport operations. ESD has no comments.

Sincerely,

Robert D. Freeman  
Airport Environmental Manager II

RDF:CL:sts





# Los Encinos School

17100 Ventura Boulevard, Encino, CA 91316  
818.990.1006 818.990.0143 www.losencinosschool.org

November 25, 2013

Ilene Reinfeld,

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles  
P.O. Box 532711  
Att: Ms. Erin Jones CESPL-PD-RN  
Los Angeles, CA 90053 -2325

Dear Dr. Axt,

As third graders we are learning about our community. One of our service projects is with The Village Gardeners of the L.A. River. This organization works tirelessly to beautify the path around the cement embankment of the LA. River in the area at Valleyheart and Longridge in Sherman Oaks. Our school specifically helps by purchasing approximately 25 native plants. Then we go as a third grade group, meet with Rick Rabins, President of the Board of The Village Gardeners, and start planting. Recently, we read about Mayor Garcetti's interest in restoring the habitat along the river. With this in mind, we thought you might like the perspective of the third graders. This ABC Book is comprised of their impressions from their recent visit.

It is very important to make a difference in our community, be global citizens, and change agents. We look forward to learning more about Alternative 20 and the Los Angeles River Ecosystem Feasibility Study. We hope that our ABC Book gives you additional information.

Sincerely,

*Jenny Lapidus*

Jenny Lapidus  
Service Learning Advisor

Evan

*Dante*

Cash

Isabella

Ransom

Kate

Natalie

Carter

*Sheridan Geller*

Sheridan Geller  
Teacher

Ben

Jaely

Zahra

Quinn

Kyle

Dylan

*Jennie Kim*

Jennie Kim  
Associate Teacher

Dustin

Audrey

Brianna

Owen

Alexandra

Matthew

Sophia

Ella

Finn

Jacoba

Ruby

Alex





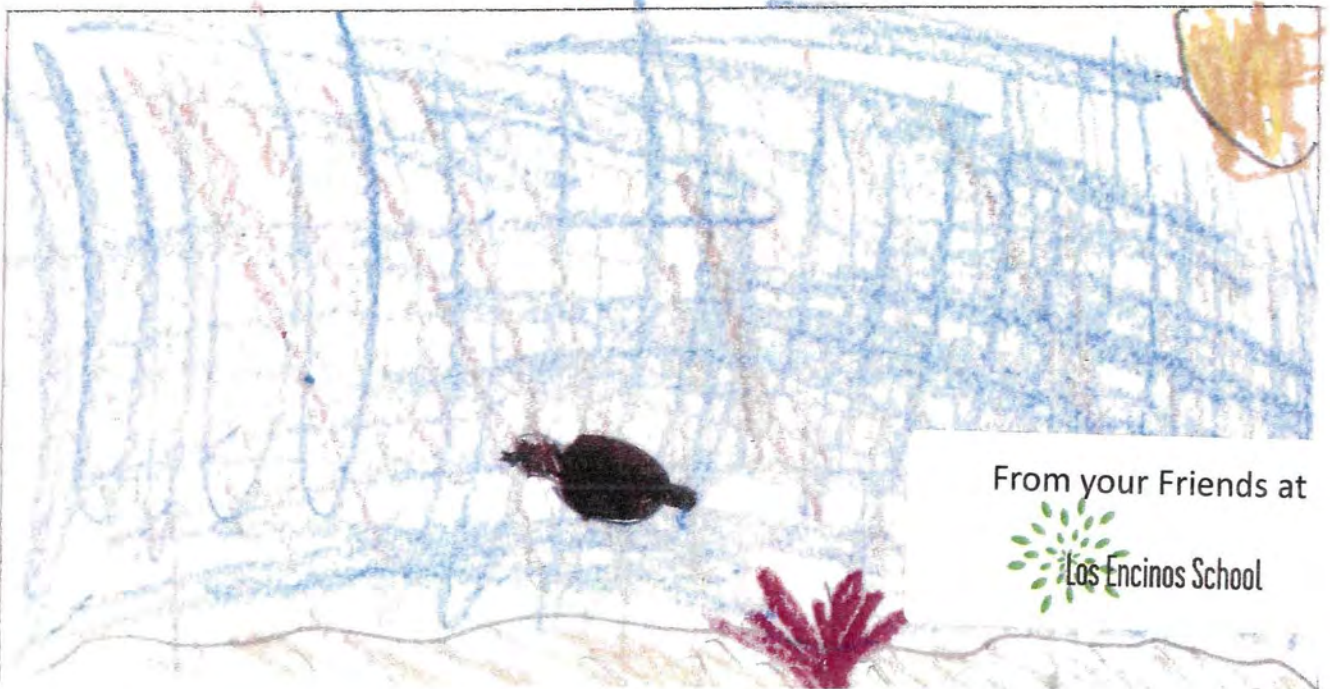
xo/

Los Encinos School



about the  
L.A. River

Book



From your Friends at

Los Encinos School



Awesome

By Evan

The path along the L.A. River is an awesome place to bring your family.  
You can bring your dog too. There is a lot of nature to see.

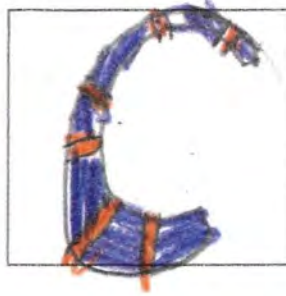




## Bad Pollution

By Alex

Things like plastic forks, Twix candy wrappers, and toilet paper cause a lot of harm to the fish, birds, and ducks. On my visit I saw the items I mentioned floating in the L.A. River.



Care

By Dylan

I really care about the L.A. River. I am worried because the pollution makes it hard for the wildlife. The L.A. River needs people to help it stay clean.





## Dead Branches

By Dustin

I saw dead branches on trees. The branches need to be cut off so that the trees can stay healthy. I also saw a dead squirrel and a dead duck. I hope they did not die because of pollution. If the dead branches are removed, the path along the L.A. River will be prettier and then there will be more oxygen and that would be good.



## Egrets

By Matthew

The egrets are amazing to watch and they are different from any other kind of bird I have ever seen. I think it is great to bring your family because of the egrets and because you get to be outdoors.





Fish

By Dante

There are fish like tilapia swimming in the L.A. River. The fish are important and hard to see. They need to be protected. I hope that the fish don't die from pollution.

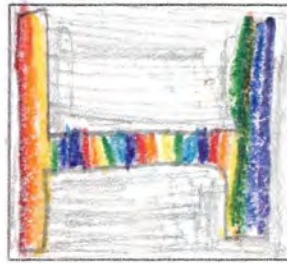




Graffiti

By Sophia

Graffiti makes me really sad and I saw some at the L.A. River. I want people to stop ruining the L.A. River. I hope that I can go back and the graffiti will be gone. I know it costs money for workers to remove all the damage. I think it is important to spend the money to keep the L.A. River a place for families to enjoy.

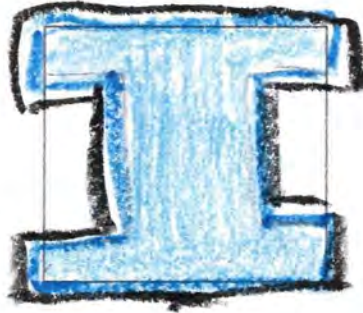


Happy

By Elia

The ducks seemed really happy to me at the L.A. River. But if they eat trash they might die or get really sick. I think it is important to remove the trash so that the ducks will stay extra healthy.





Icky

By Finn

The water looked icky on the day I was there. That is because it hasn't rained in a long time. I worry about the fish and the ducks if the water is not clean.



## Joggers

By Quinn

I saw joggers having a great time along the path of the L.A. River. The path is a fantastic place for exercise and there is great scenery. I think more people should go there. The only thing that is sort of ugly is the cement wall around the river and I hope that plants could be planted to make it more beautiful.





### Kit Kat Candy Wrapper

By Audrey

There was a Kit Kat candy wrapper in the L.A. River. This can harm fish, ducks, and other wildlife that comes to the river. I wish people would stop polluting the river so that the animals can survive and have a peaceful and happy life.

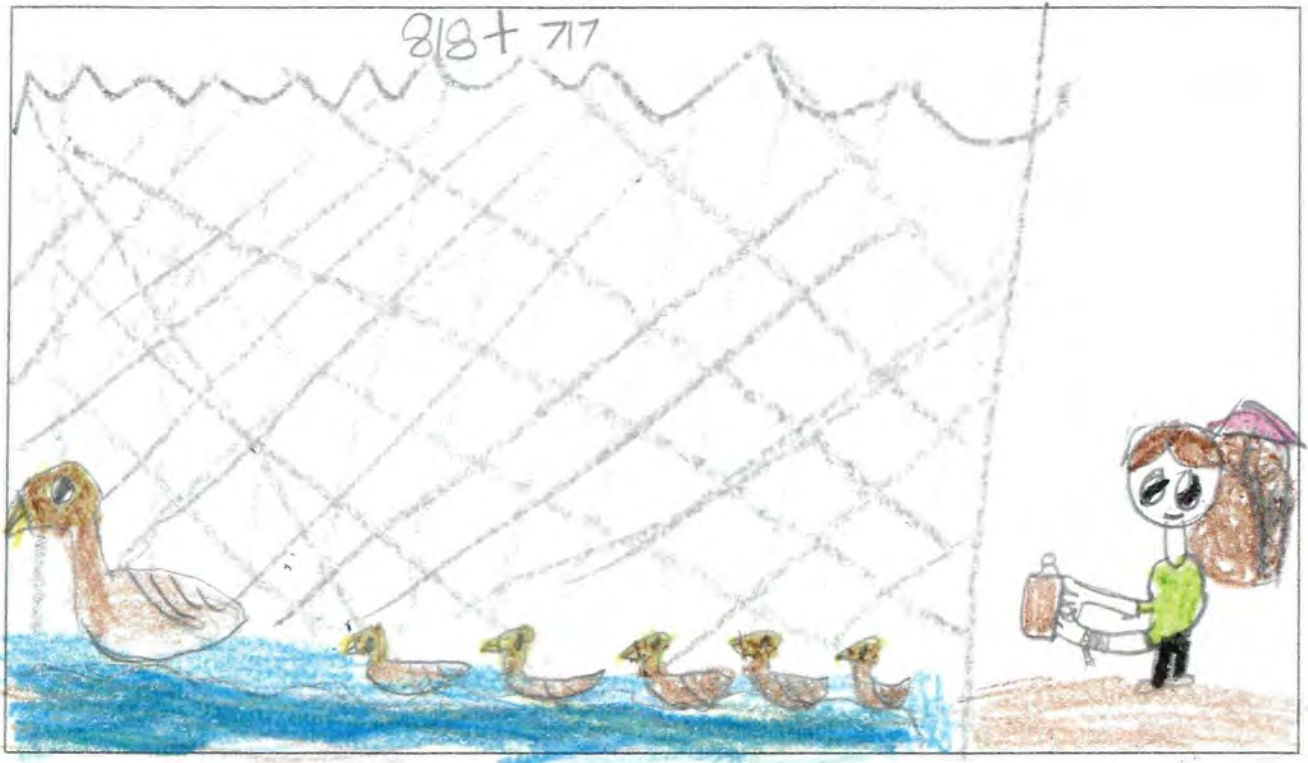
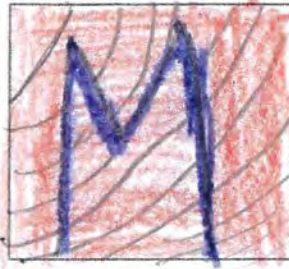




Love

By Natalie

I love the L.A. River and I am so glad that I planted native plants there to make it more beautiful. I wish I could come again and plant native plants on the concrete wall. I wish that the concrete wall could be changed. It is not very pretty. I also think if it was more beautiful people would respect it more.

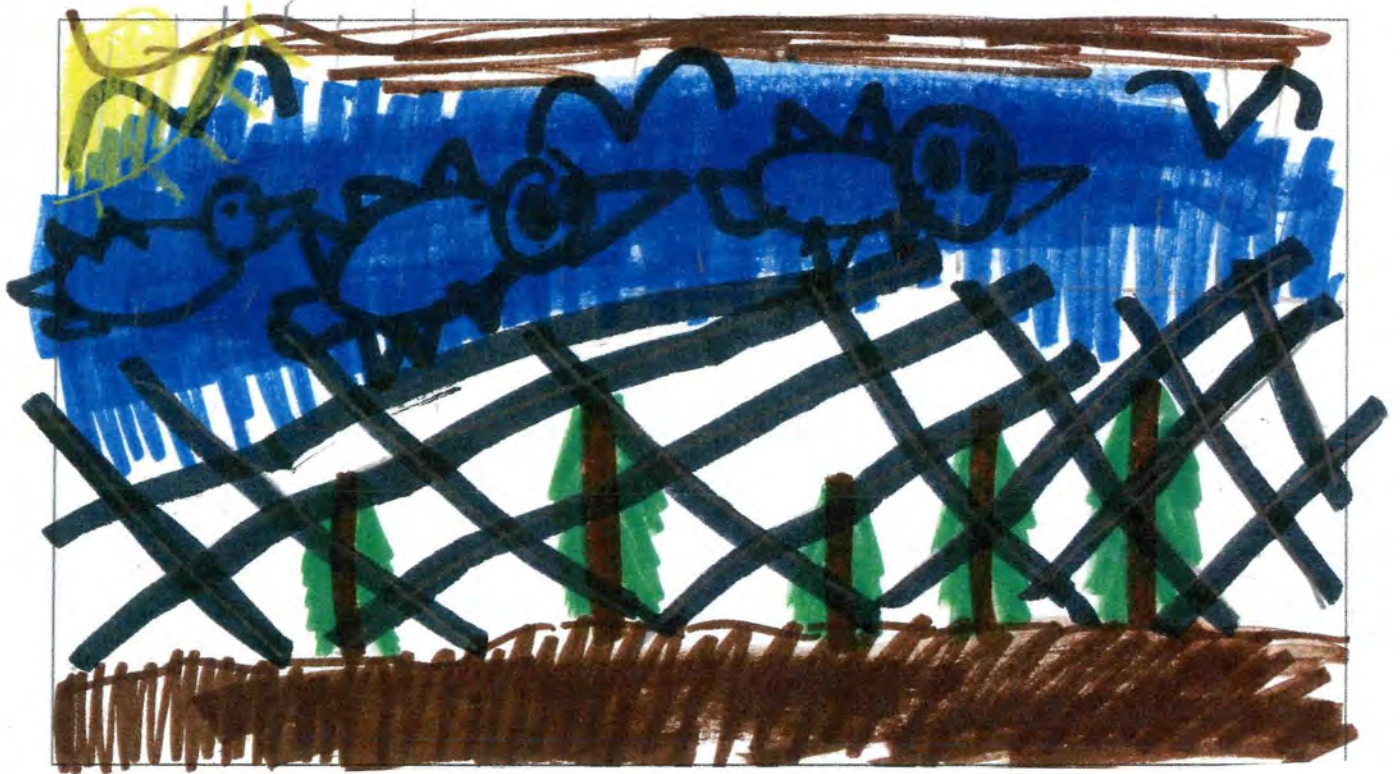


## Mallards

By Zahra

Mallards are beautiful! They were sunning themselves when I was there. They were very close to harmful trash. I am very worried that they are going to eat dangerous trash. I also think that the people who go to the path at the L.A. River are very lucky to see mallards and other waterfowl and birds.





## Nice and Native

By Kate

The L.A. River is a nice place for your family and while you are there you can notice birds and fish and ducks. I suggest you come with your dog and a picnic lunch. It is okay to bring a stroller if you have a baby. Just remember to pick up your trash. Also remember to notice the native plants because they are better for our environment.



Ocean

By Kyle

The L.A. River flows into the Pacific Ocean. That is why it is important that we don't allow pollution in the river because it would end up in the ocean. My class planted native plants along the seating area. I hope you can visit one day.



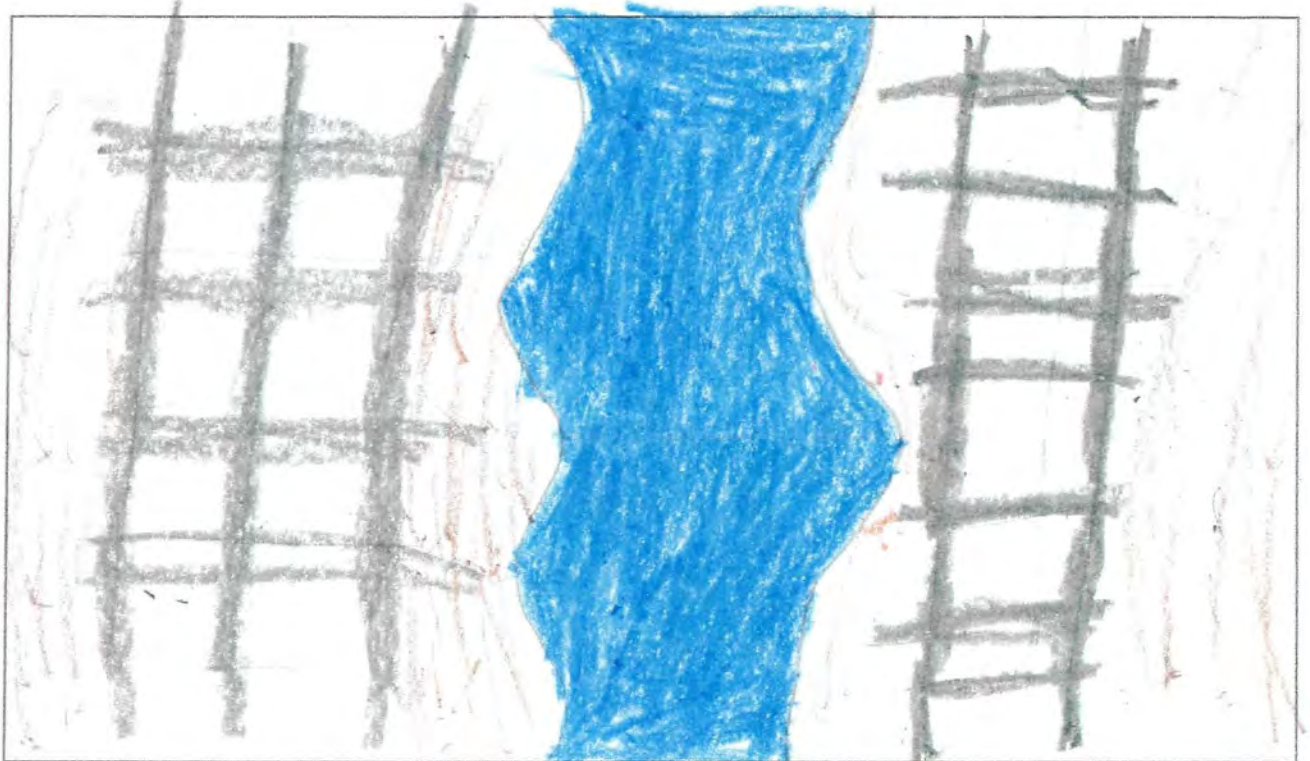


## Pollution

By Carter

We should have a dam built to stop the trash that I saw in the L.A. River. All the fish and animals need a cleaner river. The natural resources along the river include water, fish, trees, and birds. I think we should take down the cement walls to keep everything more natural.

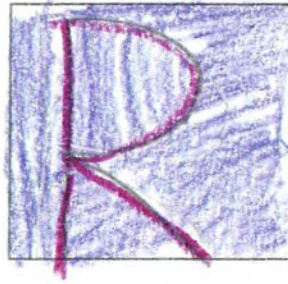




Quiet

By Joely

It is really quiet by the L.A. River. It is peaceful and beautiful but the trash is not fun to see. I hope that when I visit again the trash is gone.

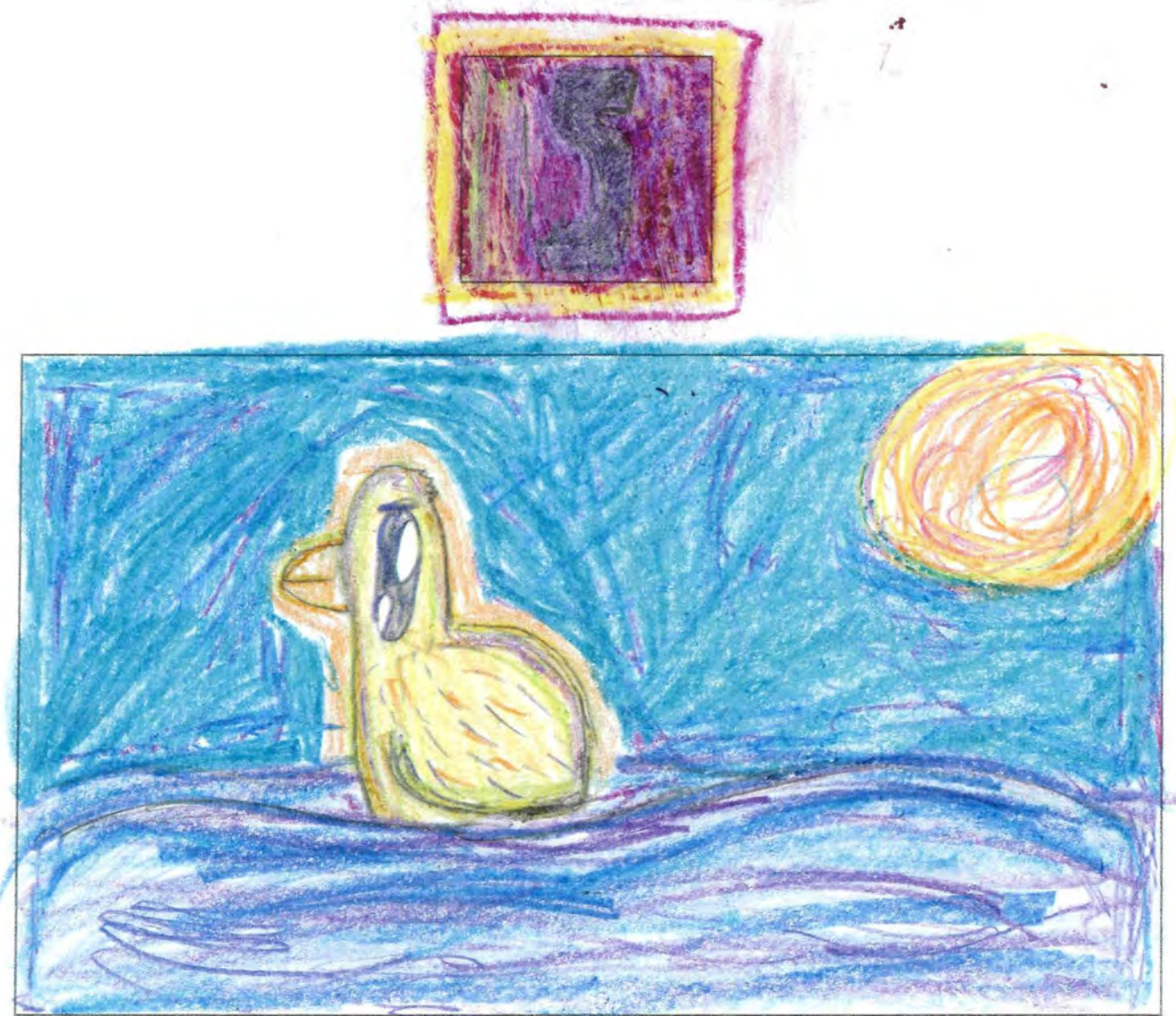


Mr. Rick Rabins, Volunteer

By Isabella

Mr. Rabins is a hero to the river. He is president of The Village Gardeners of the L.A. River. He does not get paid. My school thanks him for all he does to keep this special place very safe for the animals and birds that visit the river. He also keeps it looking beautiful for the people who visit.





### Super Cute Duckies

By Cash

I was so surprised by the path and river! They are bigger than I thought. I was really surprised to see 50 ducks in the water. I really liked watching them and learning how they survive. I hope that the river can stay clean, so the ducks won't eat the trash that I saw and get sick.



## Trash

By Ruby

The trash at the L.A. River needs to be cleaned up. I am 9 years old and I would never throw trash anywhere. I think it is disrespectful that people throw trash without even thinking about what they are doing.





Unusable

By Benson

I think the L.A. River should be beautiful with native plants and trees surrounding it, and no concrete walls beside it. It should be like a beautiful park where you can go to see ducks and it shouldn't be unusable when you get there because of the trash.

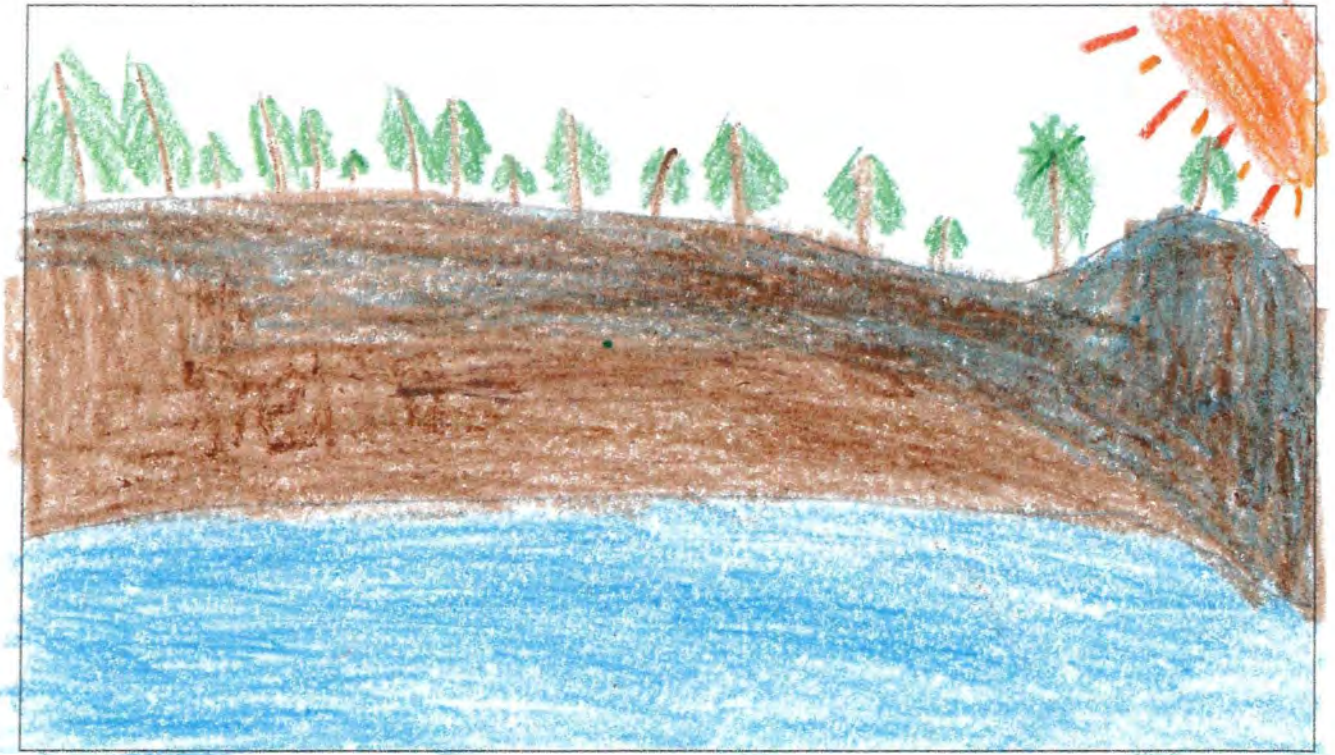




Variety

By Ben

There is a variety of things you can do at the L.A. River. You can walk on the path and look at beautiful birds, ducks, and fish. I think people sometimes don't go there because there is trash and it is not clean. I think if plants covered the cement walls more people would go because it would look nicer.

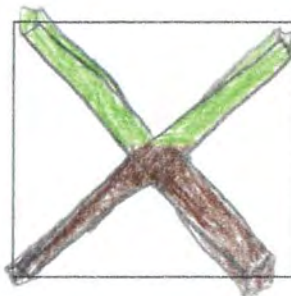


## WORDS

By Jaccoa

Water, Walking trail, Weeds, Waddle, Wonderment, Wall, Watering Can, Web-footed, Weekday, Weekend, Welcome, Welfare, Wet, Wildlife, Workers, Wingspan, Wrappers...Come to The Village Gardeners of the L.A. River and you will see why I chose all of these words, especially Wonderment!





## X Marks the Spot

By Brianna

X Marks the Spot! My picture is about the ducks swimming in the river. It is important that they have a safe place to live. It is up to people to make a good environment for the ducks because a duck can't know the difference between a piece of plastic and a piece of food. I promise to keep going there. I want to help the river look more beautiful and get rid of pollution.

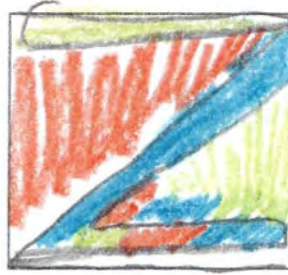


Years Ago

By Alexandra

Years ago the river would keep changing directions. If it rained too much houses and streets were flooded. To fix this, a cement wall was built. I went to see the wall. There are no flowers growing on it and there is a fence. I would like to see the wall have more nature around it because if it does, it would attract more insects. Insects would come for the pollen from the flowers, and this would help our environment.





### Zig Zag

By Owen

If you really watch the water in the river you can see it zig zag in different directions. Sometimes when the duck goes in the water it pushes the water in different directions. It is neat to watch the water.



Officers  
2013-2014

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CHRIS LAIB

First Vice-President  
DEMIAN WYMA

Second Vice-President  
MARTA ALCUMBRAC

Coordinating Secretary  
DONALD SELIGMAN\*

Recording Secretary  
DEBBIE SIMONS

Treasurer  
DONNA KOLB

Los Feliz Improvement Assn.

*Los Feliz*

Improvement Association

P.O. Box 29395, Los Angeles, CA 90029

(323) 660-1914

www.LFIA.org

October 16, 2013

Josephine Axt, Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Re: Support Alt. 20, Los Angeles River Ecosystem Restoration Feasibility Study

Dear Ms. Axt:

The Los Feliz Improvement Association, founded in 1916, represents more than 800 households in the Los Feliz District of Los Angeles. Los Feliz is just west of the Los Angeles River adjacent to Reach 3 and 4 and south of Griffith Park. We urge that the Army Corps recommend Alternative 20 because it is the most effective of the four alternatives under consideration.

Alternative 20 is the only alternative that would restore wetlands at the Verdugo Wash. This is a critical confluence of the Los Angeles River and the Verdugo Wash that used to be a wildlife corridor providing wildlife connectivity from the Santa Monica Mountains to the Verdugo Hills and to Angeles National Forest. It was lost to the interchange of the I-5 and State Route 134 and flood control concrete walls. Wildlife in the Santa Monica Mountains is already exhibiting signs of genetic isolation because of loss of habitat and loss of access across freeways and the river to the many nearby national forests. The restoration of the natural sediment buildup and wetlands will help to restore the original natural connectivity.

Over all, the LFIA concurs with Mayor Eric Garcetti in supporting the widest possible implementation of the restoration project. In the long run, we see it as the best option, ecologically, recreationally and economically. Looking toward the future, Alternative 20 is the best option for Los Angeles as a whole.

**Directors**

Nyla Arslanian  
Laura Balverde  
Stella Balesh  
Marilyn Bush\*  
Dennis Chew  
Jean Daley  
Marian Dodge\*  
Barbara Ferris  
Faith Ford  
Monique Frese  
Philip Gasteier  
Rafik Ghazarian  
Lynne T. Jewell  
Michael Locke  
Rob Menz  
Randy Myer  
Tess Nelson  
George Pao  
David Roberti  
Joel Rochlin  
Patricia Ruben  
Paul Schiada  
Mary Beth Sorensen  
Angela Stewart  
Mark Stong  
June Teal  
Ron Valdez  
Valerie Vanaman  
Gail Zaritsky

\*Past President



It would be unconscionable to only partially restore the river ecosystem. It was the Los Angeles River that nourished the development of the great City of Los Angeles. We should make every effort to restore the river to the extent possible without increasing flood risk. Alternative 20 does just that. The Los Feliz Improvement Association urges you to recommend Alternative 20 to return our river, its riparian habitat and its flora and fauna to full potential.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Chris Laib', with a stylized flourish at the end.

Chris Laib, President

cc: Los Angeles River Project Office (1149 S. Broadway, 56th floor, Los Angeles, CA  
90015)  
Friends of the Los Angeles River  
Mayor Eric Garcetti



INFORMATION

November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, CA 90053-2325

Via email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Josephine R. Axt:

Please take the necessary action to approve Alternative 20. We have been active in community and economic development in greater Los Angeles since 1995. It has been our mission to increase the flow and access to capital into low income and distressed communities. There are many underserved, low income, and communities of color along the Los Angeles River that will benefit from the increased investment under Alternative 20.

We are property owners and have the greatest desire to bring additional investors to the landscape of the LA River in collaboration with the City of Los Angeles' efforts to revitalize the Los Angeles River. We have a network of 30 financial institutions that are our partners in the delivery of sustainable economic development.

Please approve Alternative 20. Be bold and don't short change the Los Angeles River.

Make a deal, Make a difference

Sincerely,

Michael Banner  
President and CEO



# MÁS

**DATE**

November 15, 2013

**TO**

Josephine R. Axt, Ph.D.; Chief,  
Planning Division  
U.S. Army Corps of Engineers, Los  
Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
comments.lariverstudy@usace.army.mil

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**EMAIL**

info@mas.la

**WEBSITE**

www.mas.la

Dear Dr. Axt,

I am the Co-Founder of LA-Mas, a non-profit organization focused on the relationship between health, community, and the built environment. We engage in research and master-planning to promote culturally sensitive design and innovative infrastructure focusing on economic, environmental, and social sustainability. We are dedicated to creating a better balance of our environment and urban community.

As a partner of the Northeast Los Angeles Riverfront Collaborative, funded by your fellow federal partner, I have seen firsthand the potential for communities surrounded the River to be positively impacted.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains

# MÁS

**DATE**

November 15, 2013

**TO**

Josephine R. Axt, Ph.D.; Chief,  
Planning Division  
U.S. Army Corps of Engineers, Los  
Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
comments.lariverstudy@usace.army.mil

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- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The Regional Economic Development analysis shows Alternative 20:
- Provides 7015 more jobs and \$386 million more in wages during construction
- Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
- Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Elizabeth Timme  
Co-Executive Director

# METABOLIC STUDIO

Lauren Bon, Director  
Metabolic Studio  
1745 North Spring Street, Unit 4  
Los Angeles, CA 90012

Josephine R. Axt, Ph.D., Chief, Planning Division,  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms. Erin Jones, CESPL-PD-RN

November 13, 2013

To Whom It May Concern:

As a community stakeholder as well as an artist committed to the revitalization of the Los Angeles River and surrounding neighborhoods, I would like to submit the following comments on the Los Angeles River Ecosystem Restoration Feasibility Study that has been prepared by U.S. Army Corps of Engineers, in conjunction with the City of Los Angeles.

As you are well aware, the alternative that is ultimately selected by the Army Corps has the ability to affect the future of Los Angeles for generations to come. I would like to urge you, as well as the President and our Congressional leaders, to think boldly, as you did when the River was originally channelized in the earlier part of the last century. It was a tremendous feat of engineering to encase a free flowing river in concrete and reflected the thinking at the time regarding flood control, however this is a new century, with an extraordinary opportunity to right an environmental wrong, create habitat, address water quality and supply, adapt to climate change, as well as promote green jobs and equity in the country's second largest city. Large populations, many of whom have historically been underserved, will visibly benefit from your efforts and have already voiced their support for the most comprehensive alternative in your study, Alternative 20.

The study evaluates several alternatives for the purpose of restoring 11 miles of the Los Angeles River from approximately Griffith Park to downtown Los Angeles. I believe in a long-term vision to revitalize the entire length of the River's 51 miles, 32 of which are within the City of Los Angeles. The 11-mile stretch was chosen for the Ecosystem Restoration Study in order to concentrate habitat restoration in the soft bottom portion of the channel where it is most viable. However the dream of a continuous greenway from the mountains to the ocean remains, and it is important to choose the most robust alternative within the Ecosystem Restoration Study in order for Los Angeles to build upon the partnership with the Army Corps in ways

# METABOLIC STUDIO

that address the entire length of the River. Los Angeles and its stakeholders are committed to this goal and are doing their part to make it a reality.

The Administration has already acknowledged the need for partnerships and for Federal agencies to work together across missions and silos to achieve the type of results needed for true sustainability and region wide benefits. As a result, the Los Angeles River was highlighted in the America's Great Outdoors (AGO) Initiative listening session led by the Department of Interior, and has been designated as a pilot program as part of the Urban Waters Federal Partnership. In addition, Los Angeles was awarded a Sustainable Communities Planning grant by Housing and Urban Development (HUD) in order to increase economic development and job creation opportunities along the same portion of the river corridor that the ARBOR study evaluates. There has already been a substantial effort made both locally and by the Federal government to revitalize the River and it is important not to fall short of this commitment in the final crucial stages of decision-making. Any investment made now will create multiple benefits in the long term.

Furthermore, these public investments will be enhanced by interest from the private and philanthropic sectors. I have been committed to the revitalization of the Los Angeles River in my role as Director of the Metabolic Studio, a conduit through which I practice my philanthropic activities as a Director of the Annenberg Foundation. The Metabolic Studio aims to transform resources into energy, actions and objects that nurture life. It is located within the ARBOR study area, adjacent to the River and to the Los Angeles State Historic Park (LASHP), near downtown Los Angeles. The Metabolic Studio is committed to realizing the latent potential and sustainability of environments and communities.

Currently I am developing *Bending the River Back into the City*, a major long term project that includes the construction of *La Noria*, a functioning water wheel that will bend the Los Angeles River, pierce the concrete channel, and could provide an unprecedented opportunity to create a wetland and habitat restoration in a highly urbanized area in Los Angeles. Alternative 20 is the only alternative that includes Los Angeles State Historic Park where I have been working for almost the past ten years. The selection of this alternative would not only leverage the significant expenditure of public funds previously made to acquire the park, but could also demonstrate an early win for the Army Corps in implementation of restoration efforts through a collaboration with the work I have already begun. Alternative 20 is the only option that would enhance the considerable resources that I and many other stakeholders have committed toward connecting Los Angeles State Historic Park to the River.

There is tremendous public support for the restoration measures proposed in Alternative 20, including the creation and reestablishment of historic riparian strand and freshwater marsh habitat to support increased populations of wildlife and enhance habitat connectivity within



# METABOLIC STUDIO

the study area, as well as to provide opportunities for connectivity to ecological zones, such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains. As the Army Corps states, 'Restoration includes the reintroduction of ecological and physical processes, such as a more natural hydrologic and hydraulic regime that reconnects the river to historic floodplains and tributaries, reduced flow velocities, increased infiltration, improved natural sediment processes, and improved water quality.' Alternative 20 will provide the greatest opportunity to realize these benefits and will pay for itself in the long run.

As part of my work to develop the waterwheel I have traced the history of the Los Angeles Aqueduct, which just celebrated its 100th year anniversary transporting water to the region. The Los Angeles River was the City's original water supply, however the City of Los Angeles now imports more than 85% of its water, and recent studies by the Arid Lands Institute and the Council for Watershed Health have identified between 92,000 and 180,000 acre feet of stormwater runoff per year that could possibly be captured before being wasted into the ocean via the Los Angeles River. Furthermore, more than \$3,000,000 in planning dollars is currently being spent by the City of Los Angeles, Los Angeles County, the United States Bureau of Reclamation, and multiple regional water districts to better refine these numbers. Of the alternatives presented, Alternative 20 offers the greatest opportunity to remove impervious surfaces from the LA River and its tributaries, allowing for the direct recharge of some of Southern California's most productive potable groundwater aquifers, namely the San Fernando and Central Basins. Any and all opportunities to increase local water supply should be taken to reduce Southern California's reliance on the Bay-Delta, the Owens Valley, and the Colorado River, thereby increasing the chances for successful habitat restoration programs in far reaching watersheds.

In addition, Los Angeles County is entering yet another multi-million dollar planning effort to improve water quality in the region's water bodies, with the Los Angeles River taking a large percentage of those dollars. Again, of the alternatives presented, only Alternative 20 provides meaningful changes to improve water quality in the River. These water quality benefits, which come in the form of land use changes, upstream tributary treatment, and in-stream flow management, can combine to create significant improvements in the water quality of the Los Angeles River. For example, looking at the project at Mission Yard under Alternative 20, tributary treatment can reduce pollutant loading (for the pollutants evaluated) by 50% to 100% according to The Piggyback Yard Feasibility Study, when accounting for land use conversion. In combination with the proposed work components in the other reaches envisioned under Alternative 20, the water quality benefits of the project as a whole will be greater than the water quality benefits of each individual component. This is due to the consecutive stages of pollutant removal as you move downstream, which build upon one another. These water quality improvements will contribute to enhanced ecological health within each site, to all components within Alternative 20, and to the Los Angeles River as a whole.

# METABOLIC STUDIO

Clearly the selection of Alternative 20 will meet multiple critical challenges facing the Los Angeles region now and into the future. There is an opportunity to demonstrate a commitment to environmental, social, and economic justice in a very real way that meets the goals of many local as well as federal agencies and can be a model of success for urban areas across the country. I encourage you to demonstrate this leadership and I would be happy to make myself available for any further discussion.

I would like to thank you for your time and attention to this important decision you will be making on behalf of Los Angeles. Jill Sourial of my staff or I can be reached at (323) 226-1158 if you have any additional questions. I look forward to the recommendation by the Army Corps and will continue to advocate for full funding and responsible implementation of the plan once it is approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Bon", with a stylized flourish extending to the right.

Lauren Bon  
Director, Metabolic Studio

cc: Senator Barbara Boxer  
Senator Diane Feinstein  
Congressmember Xavier Becerra  
California State Assemblymember Jimmy Gomez  
California State Senator Kevin DeLeon  
Los Angeles Mayor Eric Garcetti  
Los Angeles City Councilmember Gilbert Cedillo

November 15, 2013

Josephine Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Re: Support for Alternative 20 in the USACE LA River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

Mia Lehrer + Associates is an Urban Design and Landscape Architecture firm that has worked in Los Angeles since 1997. Our work is committed to making Los Angeles a better place and we pledge our support for Alternative 20 of the US Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 offers the greatest potential for catalyzing long-lasting benefits for our residents and our local, regional, and national economies.

We believe Alternative 20 is the most ambitious and robust proposed alternative for the LA River. USACE has built a remarkable flood protection system with the LA River, but the environmental damage and community blight resulting from the river's channelization are obvious and affect our daily lives. As a firm whose focus over the last 20 years has been to build places that matter, environments that inspire with technologies that sustain, our work and efforts have always been based on the absolute need for fundamental change.

As Landscape Architects we have dedicated our work to making Los Angeles a better place for us to live, work and raise our families. We are grateful for the impact we have on our environment through our projects, and are passionate about the work we do in connection with the LA River. As founding members of the original team for the LA River Revitalization Master Plan we have learned to love the unique and powerful infrastructure that is the LA River, and worked to develop plans and visions for what it could become. Today, eight years after the completion of the Master Plan, many of our employees live in communities adjacent to the LA River and are enjoying its transformation.

Alternative 20 focuses on environmental restoration and the need for improved stormwater management; however, we see physical and social impacts with far-reaching benefits. Alternative 20 provides Los Angeles with an opportunity to create new urban forms; it supports rational densification, it brings recreational opportunities, it supports economic development, and offers necessary alternative modes of transportation to Angelenos with a network of access and connections. The revitalization of this waterway will also improve the quality of our environment, a key factor in the creation of better places for community life for the 21<sup>st</sup> century and into the future.

The study that resulted in these alternative approaches has taken 7 years to complete. We know that the final recommendation will take many more years to implement. However, now is the time to decide the extent of our commitment so that we may initiate the grassroots work it takes to achieve the most meaningful, expansive restoration in partnership with the Federal government. It is unlikely that we will have another chance to make such a bold, sweeping statement about how we can bring nature back to our post-industrial landscape.



Alternative 20 is a major investment in our people — our residents, our workers, our students, our businesses, our families, and the community institutions that serve us. Because of this, Mia Lehrer + Associates supports Alternative 20 as the most appropriate plan. We understand that transformation of the LA River will result in an improved regional quality of life and that its successes will be felt here immediately, and will be our legacy for future generations. We want to be a partner in that transformation.

Sincerely,

Mia Lehrer  
 RA

John  
 George

Robert  
 Anta Smith

Mark  
 Janiper

Aimee Smith

Michelle Sullivan  
 (Michelle Sullivan)

Ben Feldman

Mia Lehrer + Associates

Maria Gersh  
 B

Amanda Peña  
 Ana Sureda  
 David Byer

Eric Mackie

Holly Kunagawa  
 Krish Parekh

John Hutchins

Ginny Vega

Michelle Frier

Ming Ho

Tim Palen

Margot Jacobs

Melanie Maossarian

Yvonne Putter





Montrose/Verdugo City/Sparr Heights Neighborhood Association  
P.O. Box 732  
Verdugo City, CA 91046-0732

Via Email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

November 16, 2013

Josephine R. Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Josephine R. Axt, Ph.D.:

We formed our neighborhood association in 1997 with the mission of uniting our neighbors to protect our quality of life. The catalyst for the formation of the MVSNA was the Oakmont V development to be built on the hillsides of the Verdugo Mountains. Our association worked with other community groups to preserve that section of the hillside as public open space and remains committed to the preservation of open space.

Our association strongly supports Alternative 20. We echo many of the sentiments expressed by others supporting Alternative 20, and we would like to emphasize two issues:

- The restoration of the LA River with the features of Alternative 20 is a unique opportunity to expand open space in the Los Angeles area in a meaningful way, and would enhance the efforts to preserve and expand open space in the LA basin by connecting habitats and wildlife ranges.
- While cost is always a consideration, the costs will only increase. As the river is restored, that restoration will make the area more desirable and increase the land value. Action now will generate rewards long into the future.

Please include our comments in support of Alternative 20 on the Draft IFR for the LA River Ecosystem Restoration Study.

Sincerely,

Grant Michals  
President



# MOUNTAINS RECREATION & CONSERVATION AUTHORITY MRCA

Los Angeles River Center & Gardens  
570 West Avenue Twenty-Six, Suite 100  
Los Angeles, California 90065  
Phone (323) 221-9944 Fax (323) 221-9934

November 6, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

## **Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report**

Dear Dr. Axt:

The Mountains Recreation and Conservation Authority (MRCA) commends the City of Los Angeles Bureau of Engineering and the U.S. Army Corps of Engineers' (Corps) efforts on the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report (ARBOR) and offers this comment letter regarding the potential for transformation of the Los Angeles River (River). The Santa Monica Mountains Comprehensive Plan, adopted in 1979 to preserve and protect what is now the Santa Monica Mountains National Recreation Area and other areas, is a direct parallel to the Los Angeles River ecosystem restoration. While considered a daunting endeavor at the time, the past three decades have witnessed the investment of \$750 million in land acquisition and park improvements, creating an interlinked system of parkland protecting the mountains' many jewels. River restoration is at a similar situation today: The path forward is long and arduous, but in 30 years our children will look back and view a restored Los Angeles River as an inevitable outcome and an essential part of the fabric of the City of Los Angeles (City).

We appreciate the time and efforts the Corps and City have expended to work with the community and prepare the ARBOR study. We have reviewed the report in detail and we are providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in the ARBOR study as the Tentatively Selected Plan, we found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Dr. Josephine Axt  
November 6, 2013

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## **Institutional & Technical Recognition**

“Per USACE Engineering Regulation (ER) 1105-2-100, significance of resources and effects will be derived from institutional, public, or technical recognition,” page xx. The Mountains Recreation and Conservation Authority (MRCA) is listed on pages xxii and 1-13 as being involved in revitalization activities on the Los Angeles River since the 1990s by constructing a series of pocket parks along its banks. Per page 4-8, the MRCA also participated in the charette process. Per page 3-61, MRCA is recognized as managing the Los Angeles River Pilot Recreation Zone.

It should also be noted that the MRCA has invested many millions in building parks along the Los Angeles River and its tributaries to fulfill our mission, which is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. The MRCA manages and provides ranger services for almost 69,000 acres of public lands and parks that it owns and that are owned by the Santa Monica Mountains Conservancy (Conservancy) or other agencies and provides comprehensive education and interpretation programs for the public. The MRCA works in cooperation with the Conservancy and other local government partners to acquire parkland, participate in vital planning processes, and complete major park improvement projects. We should also be recognized as an organization at the forefront of creating natural recreation amenities and programs in the second (2<sup>nd</sup>) largest metropolis in the nation. In particular, the MRCA manages and operates nine (9) parks along the River in the ARBOR study area.

By all accounts, the current state of the River is **unacceptable and degraded**. On pages 2-17 through 2-19, ARBOR enumerates the ecological problems with the River especially as impacted by urbanization and flood risk management. The need for restoration is demonstrated by our institutional and technical recognition of the importance of the River and its tributaries to the region's ecosystem function and resiliency.

## **Public Recognition**

The MRCA has provided nature education programming in the ARBOR study area for **more than 20 years**, serving thousands of children and their families. These programs include public campfire programs at pocket parks along the River, 12-week Junior Ranger Programs with community-based partners, field trips for local schools and organizations, and interpretive programs for all ages. One pre-school program is even called “Mommy, the River and Me.” This summer the MRCA managed the opening of a section of the River within the study area to kayaking and water craft through a partnership with the Corps and City. The Los Angeles River Pilot Recreation Zone, as the program was called, gave Angelinos an opportunity to see and experience the River in a different way, increasing the understanding of the River as a vital natural resource

Dr. Josephine Axt  
November 6, 2013

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and expanding the constituency for recreation and education along the River. The popularity of these programs, serving an audience that is both local and regional, illustrates a widespread interest and engagement on the part of the public. Clearly, the general public recognizes the importance of the Los Angeles River as an environmental resource, as evidenced by the large numbers of people engaged in the above activities.

### **The Value of Recreation**

Per page 6-3, the third ARBOR study objective is to Increase Passive Recreation. As a local agency, we know there is a great demand for both active and passive recreation in the adjacent neighborhoods. In America's second largest city there is a serious lack of open space and recreational opportunities. We urge the Corps to revise the proposed recreation plan for Alternative 20.

The aforementioned interest and engagement with the River should be supported with restoration designs that allow additional appropriate public access and interpretation of the restoration, watershed and habitat. The recreation plan should take advantage of such locally popular passive recreation opportunities as kayaking, bicycling, hiking, bird-watching and community gathering by maximizing the relationship between nature and people. The recreation plan will be the way the Corps garners public support for the restoration efforts, but only if the plan is as robust as possible. Furthermore, the opportunity to use the restored wetlands and habitat areas as an educational resource for local schools and the community at large should not be wasted. Design of trails, for example, should accommodate group gathering on the edges near educational opportunities and allow for placement of interpretive signs. Corps policy allows the recreation plan to cost up to 10% of the construction plan per the Corps' Engineer Regulation 1105-2-100: Planning Guidance Notebook, Appendix E – Civil Works Mission and Evaluation Procedures, page E-182. To accommodate a more robust recreation plan for Alternative 20, we urge the Corps to spend the maximum of 10% as opposed to the 1% that was projected to be spent on the plan for Alternative 13. Recreation is a critical component to keeping the River's restoration safe and functional.

The annual operations and maintenance cost for the recreation component is estimated to be \$42,206 (Appendix C, Attachment 6, page 6-1). Based on over 20 years experience managing natural parks and trails in urban Los Angeles, we are concerned that this estimate will only fund the bare essential tasks to upkeep materials and facilities. Restoration of the River in the ARBOR study area is bound to become a tourist and regional attraction in its own right, but also because it is in close proximity to existing attractions like the Los Angeles Zoo, Griffith Park, Dodgers Stadium, Downtown Los Angeles and The Walt Disney Studios in Burbank, California. It should be anticipated that the River will incur heavy use of the recreation elements. Additionally, there will be the common challenges of maintaining natural amenities in urban areas. In our experience, these challenges include graffiti on hardscape and tree trunks, theft of



Dr. Josephine Axt  
November 6, 2013

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locked metal equipment, theft of vegetation, prolonged illegal camping and the like. The MRCA costs to maintain a one mile long stretch of linear stream restoration along the Tujunga Wash is \$80,000 annually. We recommend the cost estimate of annual maintenance and operations for the recreation component of the project should be increased to anticipate site over-use and increased vandalism in the urban environment.

While vandalism cannot be prevented, we have found that “good uses” are effective deterrents to “bad uses.” Costs for multi-week nature education programs can cost approximately \$10,000. The kayaking program we administered this summer did need resources from our ranger, interpretation and planning divisions. In addition to maintenance funding, funding should be set aside to develop and operate robust interpretation programs.

### **Cost-effectiveness**

Cost is a factor in today's constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the River to multiple large corridors and refuges in the mountains and along the river banks. In so doing, we will provide benefits in restoring a balance for the species in the ecosystem and the public within an urban setting.

Real estate costs are a major factor in any development in an urban area, including ecosystem restoration developments. Land acquisitions in the City will be expensive. However, the scarcity of habitat and ecosystems in an urban area are far more valuable than in other parts of the nation because of that scarcity. The City of Los Angeles is the second largest city in terms of population in the U.S. The value of the ecosystem should be valued even higher in light of the dearth of such habitat in the area.

Alternative 20 is a “Best Buy” plan. It was determined to be efficient but not the most efficient of the four final plans as measured by the cost effectiveness/ incremental cost analysis (CE/ICA). Throughout the discussion of CE/ICA in the Integrated Feasibility Report, statements are made that this is a tool to assist in plan formulation and evaluation “to help inform a decision” (Section 4.11, pages 4-34 and 4-35). However, Alternative 20 is the most complete, cost-effective, and acceptable plan in terms of true ecosystem restoration and sustainability. We believe that if the decision criteria are structured to conform to the Corps' own analysis, and other values discussed above are given adequate consideration, either in additional habitat units or by some other means, it will become clear that the incremental benefits of Alternative 20 relative to the costs will make Alternative 20 the Preferred Plan.

Dr. Josephine Axt  
November 6, 2013

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The increased effectiveness of the Alternative 20 is commensurate with the increased costs:

- Alternative 20 restores 6.4 miles of habitat or 58% of the ARBOR length which is two times the length of habitat restored in Alternative 13 (3.2 miles or 29% of ARBOR).
- According to the estimated quantities for demolition of concrete presented in the Appendix C: Cost, Alternative 20 removes 117,918 cubic yards of concrete while Alternative 13 only removes 36,891 cubic yards. Thus, Alternative 20 removes 3.2 times more concrete than Alternative 13.
- Alternative 20 provides the greatest connectivity of the final four plans. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. The restoration of a more natural connection to Verdugo Wash substantially enhances the benefits of the ecosystem restoration by providing connectivity for wildlife and plants into the historic floodplain of the Verdugo Wash and into the Los Feliz Golf Course, the Verdugo Mountains, and the San Gabriel Mountains.
- The greater connectivity and biodiversity provided by Alternative 20 will provide the restoration improvements greater ability to naturally be self-sufficient, meaning the annual maintenance costs will likely be less than that of Alternative 13. The thin linear planting areas in Alternative 13 are more susceptible to become overrun by invasive species and urban vandalism.

The ARBOR study claims the cost of not doing the project is \$0, however, this is not an accurate cost valuation. On page 4-32, Figure 4-1 *Baseline to Future HU Comparison* demonstrates there will be a loss of about 1,000 habitat units over 50 years if no restoration is done. This further degradation of the River will further isolate the community from regional visitations which help to boost local economies and property values. Page 4-61 shows values annual net recreation benefits at \$2,905,732 versus \$5,295,376 in annual recreation benefits provided by Alternative 13. The value would be greater for Alternative 20. Without the restoration, there is also a loss of such public health benefits as increased options for active lifestyles, better air quality and better water quality. According to an article in Forbes magazine "The Business of Obesity, What it Costs Us" (2013), obesity in America costs \$152 Billion in direct costs including health care services, medical tests and drugs to treat comorbidities. Reducing the obesity rate by 5% could lead to savings in health care costs that could pay down the federal deficit by 13%. The restoration of plants and soil biology within the River restoration zone will naturally clean and filter stormwater runoff, saving municipalities hundreds of thousands of dollars in industrial water treatment.

### **The Time is Now**

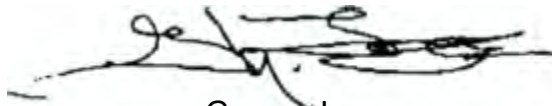
Cost and construction feasibility will always be factors that hem in a plan, which why as a planning document, the ARBOR study should be visionary and recommend

Dr. Josephine Axt  
November 6, 2013

Page 6

Alternative 20. If not now, then when? The country has little patience for public investment to re-study an area. We urge the Corps to select Alternative 20 as the final Federal plan, as it provides the greatest net sum of economic and restoration benefits. The local sponsor, the City of Los Angeles, has committed to its cost-sharing responsibilities. This is the right plan for restoring the ecosystem values that were lost by the channelization of the Los Angeles River; and the right plan for the people of Greater Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Lange', written over a horizontal line.

George Lange  
Chairperson

cc: Dr. Carol Armstrong, City of Los Angeles, River Project Office  
Lewis MacAdams, Friends of the Los Angeles River

Atch: Photos of the Los Angeles River in the ARBOR study area





Dr. Josephine Axt  
November 6, 2013

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Dr. Josephine Axt  
November 6, 2013

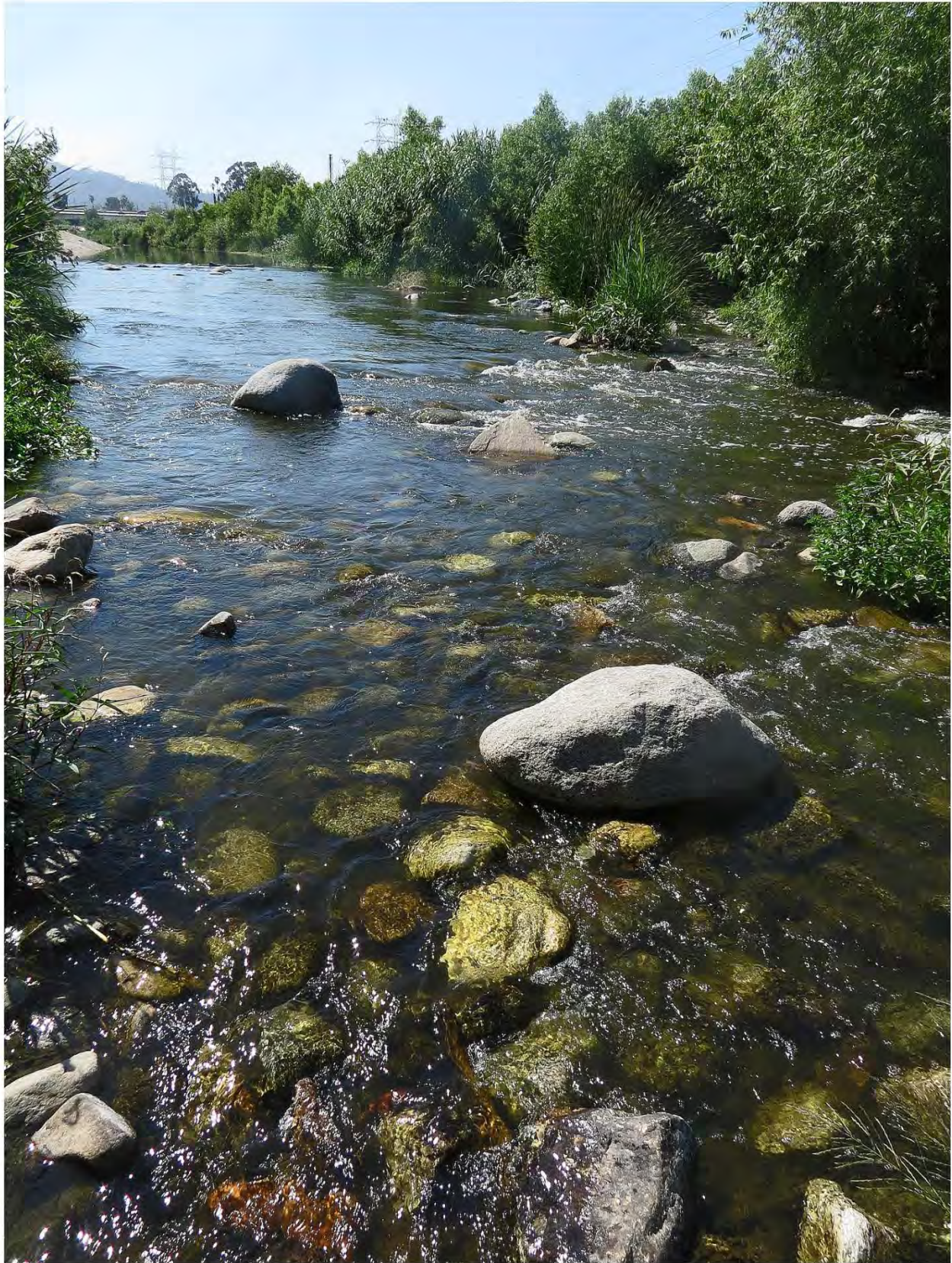
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Dr. Josephine Axt  
November 6, 2013

Page 9







P.O. Box 50716  
Los Angeles, CA 90050-0716

November 12, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones  
CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

This letter is to state that the Board of Directors of the Mount Washington Association has determined to endorse Alternative 20 and sign on to the petition that follows.

#### Official Resolution in Support of the Selection of Alternative 20

WHEREAS, the Los Angeles River is the lifeblood of our community and a vital resource to be restored and protected; and

WHEREAS, in 2006, the Los Angeles City Council approved an agreement with the US Army Corps of Engineers (Corps) for the Los Angeles River Ecosystem Restoration Feasibility Study (Study); and

WHEREAS, in 2013, the Corps has developed a final array of four alternatives for the Study, and only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing a profound hydrological link between the Los Angeles State Historic Park and the river; and

WHEREAS, these two areas provide critical wildlife habitat connectivity to the Verdugo and Elysian Hills, respectively, and are included in the five key opportunity areas of the City Council-adopted Los Angeles River Revitalization Master Plan, which the US Congress directed the Corps to consider; and

WHEREAS, **Alternative 20** provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from

the river's channelization—providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles

***NOW, THEREFORE BE IT RESOLVED, that the undersigned supports the selection and full implementation of Alternative 20 by the United States Army Corps of Engineers to restore our Los Angeles River.***

By signing, I agree to submit my name and the name of the Mount Washington Association as an official public comment regarding implementation of the Los Angeles River Ecosystem Restoration Feasibility Study.

Sincerely,

A handwritten signature in black ink, appearing to read "Pilar Buelna". The signature is fluid and cursive, with the first name "Pilar" and last name "Buelna" clearly distinguishable.

Pilar Buelna  
President

Cc: Mayor Eric Garcetti  
Councilmember Gilbert Cedillo  
Councilmember Jose Huizar



**NATIONAL WILDLIFE FEDERATION®**

California Office  
209-966-2623  
prattb@nwf.org  
www.nwf.org

November 14, 2013

Via Email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Re: Support for Alternative 20 – Draft Integrated Feasibility Report Los Angeles River Ecosystem  
Restoration Study

Dear Ms. Axt:

On behalf of our more than four million members and supporters, the National Wildlife Federation writes in strong support of Alternative 20 in the Draft Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration Study. We urge the Corps to select Alternative 20 in its final plan.

The National Wildlife Federation (NWF) is the nation's largest conservation education and advocacy organization. NWF has more than four million members and supporters, including more than 250,000 members and supporters in California, and conservation affiliate organizations in forty-eight states and territories. NWF has a long history of working to protect and restore the nation's water resources and the fish and wildlife that depend on those vital resources.

NWF is working in Los Angeles and other cities in California to create wildlife corridors across urban areas. Fostering connections with wildlife on a daily basis both improves the health of people living in urban communities and provides important conservation benefits. We have partnered with the Center for the Environment and Sustainability at UCLA to help map potential areas in Los Angeles for enhancing green space and creating green corridors across the city using backyards, schoolyards and business properties. The Los Angeles River corridor is a critical area for these efforts.

The Los Angeles River is a victim – and a national symbol – of misguided attempts to control the nation's rivers by encasing them in concrete. However, with this study, the U.S. Army Corps of Engineers (Corps) can help undo decades of mismanagement by recommending a comprehensive plan that will restore broad stretches of the once vibrant Los Angeles River for people and wildlife. We join Mayor Garcetti, the Los Angeles City Council and a broad array of conservation and community organizations in urging the Corps to adopt Alternative 20 in its final integrated feasibility report to redress the damage that has been done to the Los Angeles River, the river's wildlife, and the people of Los Angeles.

Alternative 20 provides critical restoration components missing from the other alternatives, including from the Corps' tentatively selected Alternative 13. These additional restoration components are essential for restoring habitat along the river and connecting habitat areas in an ecologically significant way. They are essential for wildlife and for the health and well-being of the residents of Los Angeles, and. For example:

- Alternative 20 provides double the length of channel restoration as Alternative 13, and is the only alternative that restores vital wildlife corridors. The 45 additional acres of habitat created by Alternative 20 could be instrumental in the reintroduction and recovery of many endangered, threatened and rare species that historically occupied marsh, riverine and riparian habitats in the Los Angeles River. For example, the endangered least Bell's vireo historically occupied habitat in Reach 2, and probably many other sections of the LA River.
- Alternative 20 is the only alternative that will connect wildlife from the Verdugo Wash to the mountains and sets the stage for a critical wildlife corridor between the Santa Monica Mountains the Verdugo Mountains and the San Gabriel Mountains. In addition to serving as a critical wildlife corridor, the benefits from restoring the Verdugo Wash wetlands is enormous, and would be especially important for ensuring viable amphibian populations which are under severe stress.

By allowing back and forth movement, habitat corridors help increase genetic diversity of wildlife populations and remedy population imbalances that inevitably occur in more restricted habitat areas. Wildlife corridors also provide routes that avoid the risk of road-crossing fatalities and that allow for a safe means of escape from natural and man-made disasters, including fires and floods. The Draft Integrated Feasibility Report does not adequately consider the enormous benefit of creating this connectivity, and this benefit should be more fully developed in the final study. Restoring the connectivity between the Verdugo Wash, the mountains, and the river is a critical component of an effective ecosystem restoration plan for the Los Angeles River and must be included in the final project.

- Alternative 20 is the only alternative that will fully realize the river's potential to bring green space to underserved neighborhoods by providing a hydrological link to the Los Angeles State Historic Park (the Cornfields Park) which serves downtown and the Chinatown area. The Cornfields is a large park that is near the river, but does not connect to it. Alternative 20 will connect this park and the river with wetlands and habitat. It will restore seasonal overbank flooding and allow wildlife connectivity from the park to the river. It will also increase recreational opportunities between the park and the river, an important goal for the City of Los Angeles which is working to achieve recreational equity for its citizens.
- Alternative 20 also includes expansive restoration in Reach 8 (Piggyback Yard), which is crucial to the public's vision for a restored Los Angeles River. Adding a soft-bottom channel in this reach will restore riparian forests capable of supporting endangered wildlife, and will greatly increase the hydrologic connection to the floodplain and overbank areas.
- Alternative 20 would provide an additional 10 acres of vital in-channel freshwater marsh Habitat in Reach 2(Midpoint Bette Davis Park to Upstream End of Ferraro Fields). Sensitive wildlife

species that could eventually benefit from this additional habitat include the threatened Santa Ana sucker, the endangered unarmored threespine stickleback, and the endangered arroyo toad. Added marsh habitat in Reach 2 could also aid the recovery of several listed plants, including the endangered marsh sandwort, the endangered Gambel's watercress, and the endangered Ventura marsh milk-vetch.

The National Wildlife Federation urges the Corps to adopt Alternative 20 to ensure ecologically significant restoration of the Los Angeles River, increase habitat connectivity, and create meaningful public access to the river for residents of Los Angeles.

Sincerely,

A handwritten signature in cursive script that reads "Beth Pratt".

Beth Pratt  
California Director, National Wildlife Federation

The Northeast Los Angeles Arts Organization (NELAart) strongly supports Alternative 20 as put forth in the U.S. Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study.

We realize that our mission to promote local arts and galleries, at first glance may not appear to bear much similarity to your mission to promote environmental restoration and connectivity.

However, we are both about promoting healthy, livable communities and about creating a vibrant present that builds on a rich history.

Further, as the Los Angeles River and the Arroyo Seco are being restored, artists and artisans are finding the small-scale industrial buildings that line their banks to be increasingly attractive and useful.

Our missions are, therefore, very much tied together, and we believe that Alternative 20 offers by far the most promise for a healthy and vibrant future. Alternative 20 will provide 425% more economic redevelopment employment and 400% more economic redevelopment income than Alternative 13. Rarely are there opportunities of this scope to do so much for our environment, our wildlife, our residents, our scenic beauty and our economy.

We look forward to the future--with a restored Los Angeles River and Arroyo Seco at the community's core.

Thank you for your work.

NELAart  
5052 York Boulevard  
Los Angeles, CA 90042  
Cathi Milligan, Executive Director  
Margaret Arnold, News Editor  
Margaret.NELAart@gmail.com  
NELAart.org





PO Box 29155  
Los Angeles, CA 90029-0155

November 17, 2013

Josephine R. Axt, Ph.D.; Chief, Planning  
U.S. Army Corps of Engineers, Los Angeles  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Re: Los Angeles River Ecosystem Restoration Feasibility Study

Dear Ms. Axt,

The Oaks Homeowners Association is an organization that represents 800 households of citizens adjacent to Griffith Park. We embrace the park's habitat and wildlife, and we care about the health of the park's ecosystem and its connection to the Los Angeles River and beyond. Over the years, we have supported scientific surveys conducted in Griffith Park, including the current Griffith Park Wildlife Connectivity Survey which not only has documented the deer, coyotes, and bobcats crossing treacherous barriers surrounding the park, but also a mountain lion known as P-22.

Scientists tell us of the critical importance of genetic mixing between populations of various species. Our government needs to act responsibly to encourage this to happen, especially when certain actions by various agencies were largely responsible for creating these impediments to wildlife in past decades as the urban population grew. For this reason, as well as others, we strongly support Alternative 20 over Alternative 13.

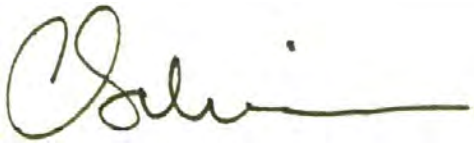
The Verdugo Wash opportunity area, in particular, could provide seasonal wetlands that create long-lost habitat such as that which existed prior to the channelization of the river and the building of Interstate-5. This area creates connectivity to the Verdugo Wash which can someday become an important habitat connection to the Verdugo Mountains and the San Gabriel Mountains.

Similarly, the Cornfields can be transitioned to rich marsh habitat which connects with the river and Elysian Park, currently an isolated habitat jewel.

The end result with Alternative 20 would be higher biodiversity, better connectivity and higher sustainability of our precious Mediterranean climate ecosystems.

Alternative 20 fits well with the vision and commitment the City of Los Angeles has made with regard to recreational opportunity and social equity. The extra funding is well worth the added value brought to nature and the citizens of Los Angeles. And the added value is something which planning metrics used for the study really can't measure!

Sincerely,

A handwritten signature in dark ink, appearing to read 'Caroline', with a long horizontal flourish extending to the right.

Caroline Schweich  
President

November 14, 2013

Dear Army Corps of Engineers:

Fourth grade students at Oakwood School in North Hollywood have been studying the health of various local ecosystems. We recently heard from a speaker from the FOLAR organization (Friends of the Los Angeles River) about an upcoming decision by the Army Corps of Engineers concerning projects to benefit the LA River.

We, the fourth grade class of 2013-2014, believe that supporting Alternative 20, instead of Alternative 13, would be better for the Los Angeles ecosystem, environment, and community at large.

We are supporting Alternative 20 because it would make the LA River a healthier ecosystem for plants and animals. The concrete eliminates habitat and removing more of it would allow more biodiversity. Alternative 20 is better for the environment than 13 because it covers more of the river, increasing the habitat 119 percent, which increases plant and animal populations, survival, and quality of life. It would also be better for the groundwater. A lot of water that ends up in the river is polluted and then dumped into the ocean. A natural river bottom would act as a filter, cleaning the water naturally. This is water that people could use. We could decrease the need to import water from other places and waste less. Only 3 percent of our drinking water comes from the LA river!

Fixing more of the river would also make people happier because they would have a natural place closer to their homes to enjoy. It would look like a healthier, friendlier environment. When people see how pretty it is, they will like it better and want to take care of it. There would be more recreation opportunities and students could take field trips to study river ecosystems. It would help raise environmental awareness.

If you are going to fix the river, we think you should go all the way and fix it as much as possible. Now is the best time to fund this project and we believe the benefits would outweigh the costs.

Sincerely,

The Fourth Graders at Oakwood School

11230 Moorpark Street

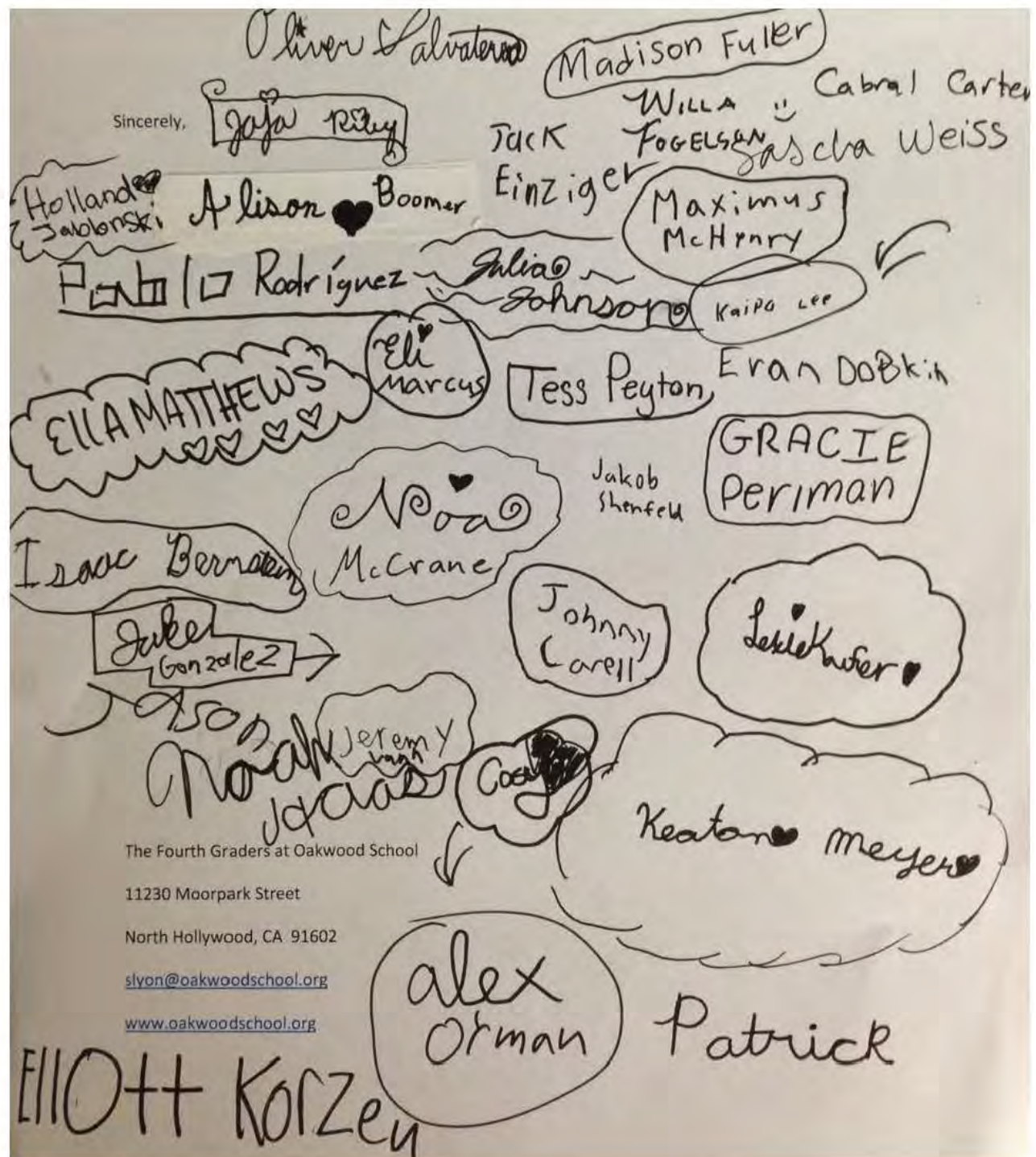
North Hollywood, CA 91602

[slyon@oakwoodschool.org](mailto:slyon@oakwoodschool.org)

[www.oakwoodschool.org](http://www.oakwoodschool.org)

We, the fourth grade class of 2013-2014, believe that supporting Alternative 20, instead of Alternative 13, would be better for the Los Angeles ecosystem, environment, and community at large.

Sincerely,







November 17, 2013

Josephine R. Axt, Ph.D  
Chief, Planning Division  
US Army Corps of Engineers  
Los Angeles District  
P.O.Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

**PASADENA AUDUBON SOCIETY**

*Founded April 1904*

1750 N. Altadena Drive  
Pasadena, CA 91107  
WWW.PASADENAAUDUBON.ORG

Dear Dr Axt,

On behalf of the over 1500 members of the Pasadena Audubon Society, I thank you for the opportunity to comment on the Los Angeles River Ecosystem Restoration Feasibility Study. The Los Angeles River is very important to us as birders and as people who care about bird habitats.

Because of the regional significance of this project, we urge the Army Corps of Engineers to select Alternate 20. While we understand the attractiveness of Alternate 13, and its apparent "value for dollar" appeal, we argue that that Alternate 20 will be the superior choice in the long run. Because it includes the Verdugo Wash which connects to the San Gabriel Mountains and the Verdugo Hills, connects the Los Angeles State Historical Park in Chinatown to the River with a wetlands interface, and restores more streams, including daylighting some which have been "lost" for years, Alternate 20 provides significantly more habitat connectivity. It provides more acreage of habitat restoration in places like Elysian Valley, the confluence, and Piggyback Yard. It would provide much more opportunity for recreation, such as bird watching, along with the restoration. Alternate 13, on the other hand, offers a much more timid approach to restoration.

We recognize that Alternate 20 is more expensive. But this is a long-term regional project, one that would bring wetlands back to the Los Angeles River on a large scale. In terms of cost, perhaps the Pasadena Audubon Society could partner with the ACOE for Audubon grant funding. This is a once-in-a-lifetime opportunity and we need to take it. Wetlands are seriously depleted in Los Angeles County, with 97% of historic wetlands lost to development. We need to restore as much as we can to provide homes for the flora and fauna whose habitats we so thoughtlessly destroyed in the name of progress.

Again, thank you for your time and the opportunity to comment.

Best regards,  
Laura Garrett (signed)  
Conservation Chair  
purplecow@jps.net



# bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission / 320 west 4<sup>th</sup> street, ste 200; los angeles, california 90013  
213/576-6615 phone / 213/576-6646 fax / santamonica bay.org

November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt,

The Santa Monica Bay Restoration Commission (SMBRC) appreciates the opportunity to comment on the Draft Integrated Feasibility Report, Los Angeles River Ecosystem Restoration Feasibility Study. We commend the Corps and the numerous stakeholders for their efforts to restore the Los Angeles River.

The SMBRC is a leader in Green Neighborhoods, a concept that connects communities with green spaces and parks. The Commission is dedicated to increasing green space and parks in urban Los Angeles. In addition to beautifying our neighborhoods and improving the quality of life for Angelinos, these parks and green spaces are also designed to catch and clean polluted runoff before it enters our streams, rivers and the Santa Monica Bay. By keeping our waterways clean and restoring natural habitats, Green Neighborhoods also protect local wildlife and public health.

We are writing today in support of Alternative 20 over the tentatively preferred Alternative 13. While we agree that Alternative 13 has substantial benefits, including riparian habitat restoration and floodplain and freshwater marsh restoration and creation, it falls well short of the more comprehensive restoration possible under Alternative 20. Specifically, we would miss the opportunity to realize the following benefits provided by Alternative 20:

- Only Alternative 20 restores the confluence of the river with the Verdugo Wash, providing important habitat connections to the Verdugo Mountains State Park and the Verdugo Mountains Open Space Preserve in the San Gabriel Mountains. Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo and San Gabriel Mountains,
- Only Alternative 20 daylights streams and connects a restored freshwater marsh at the Los Angeles River State Historic Park, directly to the L.A. River. Alternative 20 results in more than three additional miles of restored riparian habitat,
- Alternative 20 removes more than 3 times the concrete (117,918 cubic yards vs.

*our mission: to restore and enhance the santa monica bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the bay's benefits and values*





# bay restoration commission

STEWARDS OF SANTA MONICA BAY

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36,891) than Alternative 13, resulting in more than 131 more acres of restored habitat and additional infiltration capacity,

- Although Habitat Unit values from the CHAP model may not be high compared to other projects, its importance given the surrounding urban environment far outweighs the numeric output, especially given the number of people who benefit from the restoration,
- The Regional Economic Development analysis shows that Alternative 20 creates thousands more temporary and permanent jobs and adds hundreds of millions more economic benefits than Alternative 13.

Additionally, the Other Social Effects analysis shows Alternative 20, with its larger scope, will produce greater community connectivity, reach more census tracts with high poverty and high minority populations, and provide more green areas to encourage physical activity.

The SMBRC believes that, compared to Alternative 13, Alternative 20 provides the most robust ecosystem restoration, provides more jobs, and redresses some historic environmental injustices that resulted from the river's channelization. Alternative 20 also provides new public access to natural open spaces, improves public health, and enhances the quality of life in Los Angeles.

Thank you for your consideration.

Sincerely,

Shelley Luce, D.Env.  
Executive Director  
Santa Monica Bay Restoration Commission

Jack Topel  
Environmental Scientist  
Santa Monica Bay Restoration Commission

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November 6, 2013

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**Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated  
Feasibility Report**

Dear Dr. Axt:

The Santa Monica Mountains Conservancy (Conservancy) commends the City of Los Angeles Bureau of Engineering and the U.S. Army Corps of Engineers' efforts on the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report (ARBOR) and offers this comment letter regarding the potential for transformation of the Los Angeles River. The Santa Monica Mountains Comprehensive Plan, adopted in 1979 to preserve and protect what is now the Santa Monica Mountains National Recreation Area and other areas, is a direct parallel to the Los Angeles River ecosystem restoration. While considered a daunting endeavor at the time, the past three decades have witnessed the investment of \$750 million in land acquisition and park improvements, creating an interlinked system of parkland protecting the mountains' many jewels. River restoration is at a similar moment today: the path forward is long and arduous, but in 30 years our children will look back and view a restored Los Angeles River as an inevitable outcome and an essential part of the fabric of the City of Los Angeles (City).

We appreciate the time and efforts the Corps and City have expended to work with the community and prepare the ARBOR study. We have reviewed the report in detail and we are providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in the ARBOR study as the Tentatively Selected Plan, we found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.



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### **Institutional & Technical Recognition**

“Per USACE Engineering Regulation (ER) 1105-2-100, significance of resources and effects will be derived from institutional, public, or technical recognition,” page xx. The Santa Monica Mountains Conservancy (Conservancy) is listed on pages xxi and 1-13 as being involved in revitalization activities on the Los Angeles River since the 1990s by constructing a series of pocket parks along its banks.

It should also be noted that the Conservancy has invested approximately \$70 Million in building parks along the Los Angeles River and its tributaries to fulfill our mission to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails and wildlife habitats that are easily accessible to the general public. Since 1980, the Conservancy has preserved over 69,000 acres of parkland in both wilderness and urban settings, and has improved more than 114 public recreational facilities throughout Southern California. We should also be recognized as an institute at the forefront of science-based open space preservation and habitat restoration in the 2<sup>nd</sup> largest metropolis in the nation. The ecosystem restoration proposed in ARBOR is consistent with two of our framework landscape planning documents:

- *Santa Monica Mountains Comprehensive Plan (1979)*
- *Common Ground from the Mountains to the Sea, San Gabriel and Los Angeles River Watershed and Open Space Plan (2001)*

The Common Ground plan is cited in ARBOR on pages 1-16. We urge you to consider adding the Santa Monica Mountains Comprehensive Plan as it demonstrates the importance of riparian habitat restoration and connections to the biological diversity of the Santa Monica Mountains.

Additionally, we have funded the following studies and reports that should be reviewed as part of ARBOR:

- *Harvard Graduate School of Design Studio, Los Angeles River (2002)*
- *Harvard Graduate School of Design Studio, Supernatural Urbanism (2003)*
- *UC Berkley College of Environmental Design Studio, The Los Angeles River Urban Wildlife Refuge a vision for parks, habitat, and urban runoff (2005)*
- *Friends of the Los Angeles River and the Los Angeles River Revitalization Corporation's, Piggyback Yard Feasibility Study (2013)*

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By all accounts, the current state of the Los Angeles River is **unacceptable and degraded**. On pages 2-17 through 2-19, ARBOR enumerates the ecological problems with the River especially as impacted by urbanization and flood risk management. The need for restoration is demonstrated by our institutional and technical recognition of the importance of the Los Angeles River and its tributaries to the region's ecosystem function and resiliency.

1

### Public Recognition

The Conservancy has funded nature education programming in the ARBOR study area for **more than 20 years**, serving thousands of children and their families. These programs include public campfire programs at pocket parks along the River, 12-week Junior Ranger Programs with community-based partners, field trips for local schools and organizations, and interpretive programs for all ages. One pre-school program is even called "Mommy, the River and Me." The popularity of these programs, serving an audience that is both local and regional, illustrates a widespread interest and engagement on the part of the public.

2

### Importance of Connectivity

Per page 6-3, the ARBOR study objectives are: 1) Restore Valley Riparian Strand and Freshwater Marsh Habitat; 2) Increase Habitat Connectivity; and 3) Increase Passive Recreation. Despite these clear goals, the value of the ecosystem restoration appears to have been determined solely using the Combined Habitat Assessment Protocols (CHAP) model. The CHAP model is designed to address wildlife habitat on a site-specific basis but does not capture values for restoring wildlife connectivity and hydrologic connectivity. These connectivity values are critical to achieving resilient and sustainable ecosystem restoration. The CHAP model is insufficient because it does not properly consider the richness of this biodiversity hotspot, the rarity of the region's Mediterranean climate, or the intense habitat destruction and overdevelopment in the second-largest city in the United States. These are values that were essentially eliminated when the Los Angeles River was channelized and that must be considered in reaching a decision on a meaningful ecological restoration alternative. Pre-channelization values can be and need to be recreated.

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As a primary example, a principal value not considered by the model is the enormous benefit of connecting major tributary and mountainous areas to the river. The quality of connectivity provided by River restoration is of exceptional significance because it provides opportunity for the greatest diversity of plants and animals from water-loving species to upland species. Having spoken with several members of the Corps/City/resource agencies team who designated specific values for the model, we believe these connections were not valued or weighted in the model. Our determination is verified in Section 6.3 Objectives Comparison of Alternative Plans, page 6-8 and in Appendix G: Habitat Evaluation (CHAP), page 61, Section 9.0, the last paragraph, which recognizes the *“Additional benefits not captured in CHAP were used to evaluate and compare the final array of alternatives. These benefits include hydrologic connectivity to support biotic and abiotic functions, and nodal connectivity to support wildlife movement and dispersal. An assessment of these benefits is applied outside of the CHAP analysis as part of the environmental impact analysis.”* While the document compares the alternatives, we did not find evidence to support selection of Alternative 13 over Alternative 20 except the cost differential. In fact, we find much evidence in the document that supports selection of Alternative 20 for these other benefits that are not captured in the CHAP model. The discussion of Wildlife Connectivity in Section 7.1.2 of Appendix G: Habitat Evaluation (CHAP), page 59, clearly supports selection of Alternative 20 because it best meets the need and criteria presented in the document.

The key paragraphs supporting the selection of the more robust connectivity in Alternative 20 state:

*“Generally, nodes have a greater overall interaction when they are larger and closer together (Linehan et al 1995). Well connected systems prevent inbreeding depression and disease, and have a lower extinction rate as populations can more easily colonize if they are highly connected (Noss 1983; Schippers et al 1996). Without connections between habitat areas, isolation and loss of genetic diversity is imminent (Hobbs & Saunders 1990).”*

*“In order to benefit the biological integrity of a landscape, corridors should be restored to allow for dispersal between habitat areas. More corridors equal more routes to suitable habitat, creating more opportunities for dispersal. A complex network of nodes and corridors is therefore critical to restoration in an urban environment, as suitable habitat often remains unused if isolated (Hanski & Thomas 1994).”*

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A well-balanced ecosystem needs these mountainous connections to be sustainable genetically and in terms of food, cover, refuge, and territories for the flora and fauna that once thrived in and along the Los Angeles River. Connectivity greatly influences the distribution of species on the landscape, the distribution of a single species, and the distribution of genetics or gene flow. Discontinuous fragments or nodes of habitat change the organisms and their relationships, especially in the food chain. The connectivity to other large expanses of habitat ensures ecological resiliency and long term sustainability. It is precisely these types of historic connections and corridors provided in Alternative 20 that could enable the reintroduction of Steelhead Trout and other native species into and adjacent to the River by restoring the historic aquatic habitat that once existed in this area.

Improving the habitat and the connections to the River, particularly transitions to large open space areas is important. Habitats on both sides of the River, tributaries, and other expanses of land create corridors that mammals, birds, reptiles, and other species heavily utilize. Medium and large mammals cross the Los Angeles River and are monitored by the Natural History Museum (NHM). The habitats, substrate, and hydrology on those corridors play important roles in the connections these animals use.

6

Verdugo Wash and Piggyback Yard are of particular importance in creating a sustainable ecosystem. The Verdugo Wash tributary to the Los Angeles River northeast of Griffith Park connects both of these waterways to the San Rafael Hills and the Verdugo Mountains. The River corridor to the mountains provides life-supporting connections for the animals in the ecosystem. During times of biological stress caused by urbanization, fires, floods, and climate change, the survivability of plant and animal life and sustainability of the ecosystem depends on the large expansive connections of the rivers and mountains. The benefit of connectivity of the Verdugo Wash to the mountains is a critical component of any ecosystem plan and must be included in the Federal project.

Alternative 20 also increases connectivity through the Los Angeles River State Historic Park (Cornfields) to the Elysian Hills. The hydrologic connection from the Cornfields site would be restored with terracing to the Los Angeles River. Wetlands would be restored at this site.

The Alternative 20 restoration plan for Piggyback Yard is important because it connects the Los Angeles River with over 100 acres of open space by removing concrete from the



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channel and replacing it with terracing and new riparian habitat in a highly urbanized area of the City. Alternative 13 retains the concrete channel wall, which limits the usefulness of Piggyback Yard to only creatures that can fly or terrestrial species that can scale the channel wall. Alternative 20 creates an important hydrologic connection between upland restoration and the River at Piggyback Yard, Verdugo Wash and the Cornfields. Water quality and temperature is a primary objective when restoring for riverine species, especially fish, which need shaded, cool pools of water for reproduction. The value of land and water connectivity to the ecosystem is again the biodiversity created and the ability of species to find refuge in biologically stressed situations. To this end, Alternative 20 includes daylighted stormdrains, which provide opportunity for an increase of plants, of which a co-benefit is improved water quality and cool water temperature to improve habitat quality.

Alternative 20 provides the greatest connectivity of the final four plans. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. The restoration of a more natural connection to Verdugo Wash substantially enhances the benefits of the ecosystem restoration by providing connectivity for wildlife and plants into the historic floodplain of the Verdugo Wash and into the Los Feliz Golf Course, the Verdugo Mountains, and the San Gabriel Mountains.

6

As stated on page 6-27 of ARBOR:

*“Restoration of the Verdugo Wash confluence would also provide 34 acre habitat node in the Study Area, with connectivity to the Los Feliz Golf Course via existing habitat in the Glendale Narrows (Figure 6-11) and connectivity through the downstream reaches. The added restoration at the Cornfields site in Reach 7 provides a 9 acre riparian habitat node that decreases the distance between habitat nodes in the resource poor downtown area (Figure 6-11). In Alternative 20, local habitat connectivity would increase 120% within the study area over Alternative 16, through restoration of the natural hydrology and habitat at the Verdugo Wash site and its connection to Taylor Yard via existing in-channel habitat in the Glendale Narrows, as well as through restoration of hydrology and habitat at the Cornfields site, which adds a habitat node and decreases distance between nodes in the resource poor downtown area.”*

*“Alternative 20, in addition to the regional connectivity in Alternative 13, adds the Verdugo Wash tributary, which provides a future connection between the LA River and the Verdugo Mountains, a connection that also historically supported a habitat corridor for movement of wildlife. Urbanization has eliminated this habitat corridor,*

*and without restoration of the confluence at Verdugo Wash reconnection of the river to the Verdugo Mountains could not be realized. Restoration at the Verdugo Wash confluence would restore opportunity for passage to the Verdugo Mountains, a 26 square mile area serving as a stepping stone to the western San Gabriel Mountains (Figure 6-12). Additional habitat in the community of San Rafael Hills could also be incorporated into the movement corridor as a regional habitat node. Regional habitat connectivity is further improved by restoring connections between the river and the 575-acre habitat node at Elysian Park via restoration of the Cornfields site.”*

These connections to large areas of land create connectivity of habitats and species. By providing connections between habitat areas, corridors enable wildlife migration and breeding of plants and animals. As a general rule, the wider the corridor, the better because of the ability to include multiple habitat zones in the restoration activities. Wider corridors also suffer fewer impacts from adjoining land uses and have fewer edge threats from invasive weeds and predators. Additionally, the multiple large habitat areas provided in Alternative 20 will enable populations to survive and repopulate after disasters impacting the main stem of the Los Angeles River. Thus, the habitats and species will be more resilient and self-sustaining over the life of the project.

6

The CHAP model should be considered as an important tool in the planning process, but should not be the only or primary factor used in selecting the alternative plan. The model itself is probably as good as any other; it just did not recognize the appropriate weighted value of other ecosystem restoration benefits. For example, the inclusion of the Verdugo Wash and Piggyback Yard, coupled with the other elements of the Alternative 20 plan, provides double the length of channel restoration as Alternative 13, and would demonstrate an exponential benefit in the ultimate sustainability of the entire ecosystem.

### **Importance of Biodiversity**

California is part of the Mediterranean ecosystem, which only covers 2% of the Earth's land surface, yet accounts for 20% of all known plant species. The California Floristic Province has been declared a “hotspot” by the non-profit Conservation International. To qualify as a hotspot, a region must meet two strict criteria: it must contain at least 1,500 species of vascular plants (> 0.5 percent of the world's total) as endemics, and it

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has to have lost at least 70 percent of its original habitat. Today only 24% of California's original vegetation remains in more or less pristine condition.

ARBOR does not cite important local studies authored by highly respected biologists and others. The Feasibility Study concludes that few Federally-listed species are found in the Los Angeles River area. No State species of concern are listed. We recommend looking at the species whose range is biogeographically in the surrounding areas, mountains, and tributaries. Habitat loss and fragmentation lead to a breakdown in ecological processes such as wildlife migration, seed dispersal, pollination of plants, and other natural functions that are essential for ecosystem health. The result is decline in biodiversity and local extinction of sensitive species. Habitats should be created and managed to enable the reintroduction of the native species that once inhabited the Los Angeles River basin. The studies show there are many species that are progressively "blinking out" or being extirpated from the River system because channelization and urbanization have diminished their habitat dramatically over the last 50 years. The Corps has the opportunity now to lead the way to substantial and meaningful restoration for many of these species by implementing Alternative 20.

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Alternative 20 significantly increases the amount of habitat restored. Alternative 13 restores 588 acres of habitat compared to 719 acres restored in Alternative 20. More importantly, the quality of the restoration is significantly superior in Alternative 20 than in Alternative 13. The Piggyback Yard is an excellent example of the improved quality of habitat created through Alternative 20 versus Alternative 13. Both alternatives claim the 113 acres for restoration of the Piggyback Yard. Alternative 13 does not include channel modifications but uses the existing storm drains in the channel wall to convey flows from the historical wash. In Alternative 20 (Page 4-58) *"the historical wash would be restored through the property with a riparian fringe as well as other side channels, and river flows would be diverted out of the River into Piggyback Yard creating a large wetland area. A railroad trestle would be included with this alternative to allow the described restoration to occur and allowing for the connection of the river channel and the adjacent restored areas."* The River would primarily connect birds to the site because mammals, reptiles, and other wildlife that cannot fly will not be able to scale the wall to connect to the restored Piggyback Yard. The minimal connections through the storm drains in Alternative 13 do not perform the same value or quality of restoration as Alternative 20. Alternative 20 removes the concrete wall and the restores the hydrological connection in a more natural way than the culverts through concrete wall. Alternative 20

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reintegrates the hydrology and biology from the Piggyback Yard with the Los Angeles River.

The Cornfields site is another good illustration of the quality of restoration. In Alternative 13, Reach 7, the channel wall remains in place with vegetation being planted on the top of the bank in planter boxes. This will improve the aesthetics, but will not improve the habitat and wildlife value much. However in Alternative 20, the wall is removed and replaced with terracing; freshwater marsh and/or wetlands are restored; and the site is connected under a railroad trestle to the main channel of the River. This reconfiguration costs more but results in a far greater quality of habitat than Alternative 13. Higher valued habitats are achieved because of the restored hydrologic connection and the redesign of the habitat connections through terracing and streams. Thus, both the quantity and quality of restoration is greatly enhanced in Alternative 20. Additionally, as noted in Section 4.14.1, page 4-51, Alternative 20 represents *“the most intensive and largest footprint of restoration”* of the four final plans.

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### **Considerable Co-benefits**

Other values also should be considered in the decision in determining an adequate alternative. These include air quality benefits in a heavily stressed air quality region, hydrologic values, river water quality and storm water capture, which are essential to sound habitat restoration. Another value to be considered is the human environment and diverse minority communities, in particular, in a city with seriously inadequate open space and recreational opportunities.

9

### **The Value of Recreation**

Per page 6-3, the third ARBOR study objective is to Increase Passive Recreation. As a state agency working locally in Los Angeles, we know there is a great demand for active and passive recreation in the adjacent neighborhoods. In America's second largest city there is a serious lack of open space and recreational opportunities. We urge the Corps to revise the proposed recreation plan for Alternative 20. The recreation plan should take advantage of such locally popular passive recreation opportunities as kayaking, bicycling, hiking, bird-watching and community gathering by maximizing the relationship between nature and people. The recreation plan will be the way the Corps

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garners public support for the restoration efforts if the plan is as robust as possible. Furthermore, there is opportunity to use the restored wetlands and habitat areas as an educational resource for local schools and the community at large. Design of trails, for example, should accommodate group gathering on the edges near educational opportunities, and allow for placement of interpretive signs.

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### **Cost-effectiveness**

Cost is a factor in today's constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the Los Angeles River to multiple large corridors and refuges in the mountains and along the river banks. In so doing, we will provide benefits in restoring a balance for the species in the ecosystem and the public within an urban setting.

Real estate costs are a major factor in any development in an urban area, including ecosystem restoration developments. Land acquisitions in the City of Los Angeles will be expensive. However, the scarcity of habitat and ecosystems in an urban area are far more valuable than in other parts of the nation because of that scarcity. The City of Los Angeles is the second largest city in population in the U.S. The value of the ecosystem should be valued even higher in light of the dearth of such habitat in the area.

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Alternative 20 is a "Best Buy" plan. It was determined to be efficient but not the most efficient of the four final plans as measured by the cost effectiveness/ incremental cost analysis (CE/ICA). Throughout the discussion of CE/ICA in the Integrated Feasibility Report, statements are made that this is a tool to assist in plan formulation and evaluation "to help inform a decision" (Section 4.11, pages 4-34 and 4-35). However, Alternative 20 is the most complete, cost effective, and acceptable plan in terms of true ecosystem restoration and sustainability. We believe that if the decision criteria are structured to conform to the Corps' own analysis, and other values discussed above are given adequate consideration, either in additional habitat units or by some other means, it will become clear that the incremental benefits of Alternative 20 relative to the costs will make Alternative 20 the Preferred Plan.

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The increased effectiveness of the Alternative 20 is commensurate with the increased costs:

- Alternative 20 restores 6.4 miles of habitat or 58% of the ARBOR length which is two times the length of habitat restored in Alternative 13 (3.2 miles or 29% of ARBOR).
- According to the estimated quantities for demolition of concrete presented in the Appendix C: Cost, Alternative 20 removes 117,918 cubic yards of concrete while Alternative 13 only removes 36,891 cubic yards. Thus, Alternative 20 removes 3.2 times more concrete than Alternative 13.
- Alternative 20 provides the greatest connectivity of the final four plans. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. The restoration of a more natural connection to Verdugo Wash substantially enhances the benefits of the ecosystem restoration by providing connectivity for wildlife and plants into the historic floodplain of the Verdugo Wash and into the Los Feliz Golf Course, the Verdugo Mountains, and the San Gabriel Mountains.

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## Plan Selection

Ecosystem restoration projects provide valuable quality and quantity of aquatic and riparian systems. The selection of the final plan should be determined by using multiple factors. The CHAP model and CE/ICA are only some of the tools that should be used in the selection process.

The Corps set numerical decision criteria for adequacy which are artificially low and led to selection of the "low hanging fruit" for restoration rather than a plan that truly restores the historic values for species, habitat and people. The study narrowed its focus on an 11 mile stretch of the 32 mile river running through the City that has the best chance for restoration. Alternative 13 reduces the length of restoration to only 3 miles. This minimal criterion is inconsistent with the stated objectives of the study and seems to be based only on the costs without comprehensively addressing the significantly greater benefits for species and habitat in Alternative 20.

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While costs are a consideration, Alternative 20 is the most costly of the four best buy plans (Table 4-10 Final Array Costs and Outputs, page 4-47) because it restores more habitat and creates major connectivity to large blocks of land than just the relatively "low hanging fruit" restored in Alternative 13. Alternative 20 requires more land

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acquisition, much more concrete removal, raising a railroad trestle, and restoring several additional hydrological and biological connections to the Los Angeles River. These actions are indeed costly, but create tremendous benefit by restoring an ecosystem that can survive the next 50 years because of its size and robust connectivity. These elements were not valued in the CHAP model, CE/ICA, or the selection of the TSP. Alternative 20 achieves true restoration for the impacts caused by channelization of the river. Alternative 20 is practical and can be implemented as the Federal project. The Integrated Feasibility Report itself supports selection of Alternative 20 except in the conclusions based on the cost of Average Annual Habitat Units and total cost. Implementing Alternative 20 will substantially restore the River in this 6.4 mile segment. Alternative 20 is the opportunity to select the Best Buy plan that provide the best scenario for long term success and sustainability of the habitat, species, environment, and people in the urbanized Los Angeles River study area and beyond.

12

Performance targets for ecosystem restoration were established for the two major objectives: Objective 1: Restore Valley Foothill Riparian and Freshwater Marsh Habitat and Objective 2: Increase Habitat Connectivity. In Section 4.12 SELECTION OF THE FINAL ARRAY Table 4-8 and Table 4-9 analyzed all the alternatives to determine which ones meet the 19 specific targets developed for the two objectives. Alternative 20 meets every one of the 19 targets developed for the two objectives with the highest score and often with an incremental increase. Alternative 13 does not.

### Evaluation Criteria

NEPA utilizes the perspective of *significance* of resources to address impacts. Alternative 20 exhibits the most short term impacts primarily because of additional construction of the larger plan. None of these impacts rise to a level of significance. However, Alternative 20 generates the most beneficial impacts for the biological, human, and physical environment. The long term beneficial impacts caused by Alternative 20 are significant based on institutional, public recognition, and technical recognition criteria. Implementing Alternative 20 will have profound positive impacts on the biological resources, hydrological and hydraulic resources, air quality, water quality and recharge, education, recreation, health, economics, human ecology, disadvantaged communities, environmental justice, and the general sense of well being in the urbanized area. These positive benefits in ARBOR are greatest in Alternative 20. The Corps was the first to lead the nation in addressing Environmental Operating

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Principles in water resources planning process and decision making. Alternative 20 is the embodiment of those principles. Given all these reasons, the Corps should support Alternative 20 as the Federally Selected Plan.

Utilizing the Corps' Planning Guidance (ER 1105-2-100) objectives stated in Section 6.3 (Page 6-8), Alternative 20 is clearly the superior choice of plans. Alternative 20 comes the closest to mimicking the natural conditions and processes that would have occurred had the Los Angeles River not been channelized. It exhibits the best ability "*to continue to function and produce the desired outputs with minimum of continuing human intervention*" because of the size, regional and local connectivity, and restored hydrological and biological connections that create the ecosystem and enable a high degree of self-sustainability of landscape and species. Additionally, the document states "*Restoration projects should be conceived in a systems context ... in order to improve the potential for long-term survival as self-regulating, functioning systems...Considerations should be given to the interconnectedness and dynamics of natural systems...*" Again, these criteria and objectives should lead to the selection of Alternative 20.

13

The Principles and Guidelines, as shown in Section 6.5.5 (Page 6-42), identified four decision criteria to be used in selecting measures and plans. The criteria are effectiveness, completeness, efficiency, and acceptability.

Alternative 20 "*is judged to be the **most effective** of the four final alternatives. It maximizes contribution toward achievement of the planning objectives, including key nodal connections for wildlife and habitat. It also maximizes the potential for near and long term RED and OSE benefits.*"

Alternative 20 is the **most complete** by virtue of including the maximum connectivity to large land areas, the most acres for restoration, the most substantial and natural hydrologic connections, and the greatest length of restoration. These same factors render it the most resilient for long term benefits, survivability, and sustainability.

Alternative 20 is **efficient** and all features are cost effective. It is the most expensive and is less efficient than Alternative 13 because of the high incremental cost per habitat unit. This is due to Alternative 20 being the "game changer" for ecosystem restoration by technically providing substantially greater natural connections to the tributaries, mountains, and large expanses of land that will permanently be restored to open space and habitat restoration similar to that which historically occurred in this area. The cost



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to acquire land and construct the Los Angeles River as we know it today was high, and the cost to restore segments of it by removing the concrete and replacing it with terraces and natural connections will likewise be high.

Alternative 20 is the most **acceptable** alternative. All four alternatives are acceptable, but 20 most fully meets the requirement of the authorization in the Water Resources Development Act of 2007 to develop a plan *“that is consistent with the goals of the Los Angeles River Revitalization Master Plan published by the city of Los Angeles...”* Alternative 20 is also the plan that is most acceptable to the public because it is the farthest reaching restoration plan and provides the most benefits to the physical, cultural, and human ecology.

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Comparing the ranking of the four criteria for the four final plans shows Alternative 20 to be ranked first in three of the four evaluation criteria with 1 being the best.

Criteria	Alt 13	Alt 20
Effectiveness	3	<b>1</b>
Completeness	3	<b>1</b>
Efficiency	2	<b>3</b>
Acceptability	3	<b>1</b>

Alternative 13 does not satisfy all the general goals and specific objectives of the study. The decision to pursue Alternative 13 instead of 20 does not account for the benefits of a number of environmental values important to river ecosystem restoration.

The effectiveness of an urban ecosystem restoration project should not rely solely on the cost effectiveness of the creation of habitat units, but must also consider its relationships to the people and communities it serves. Congress in the 1970 Flood Control Act identified four equal national accounts for use in water resources development planning - national economic development (NED); regional economic development (RED); environmental quality (EQ); and social well-being (OSE, other social effects). As the report states,

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*“The four categories, known as the System of Accounts as suggested by the U.S. Water Resources Council, address long-term impacts and are defined in such a manner that each*

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*proposed plan can be easily compared to the No Action plan and other alternatives. Collectively, the four accounts are required to include all significant effects of a plan on the human environment” (Page 6-31).*

The selection process of Alternative 13 over Alternative 20 does not appear to have given proper significance to all the categories of the System of Accounts – specifically, the RED and OSE accounts – especially with regards to “effects of a plan on the human environment.” The measurement of the effectiveness of an urban ecosystem restoration plan is not just habitat units. The measurement must include its interaction with the people and communities it will serve now and into the future.

Appendix B: Economics of the report indicates that nearly 129,000 residents live within a half mile of the footprint of the study area at a density three times the average in Los Angeles County (Page 14). Because Alternative 20 is twice as long as Alternative 13, Alternative 20 would serve more residents. Specific to Alternative 20 is its ecosystem restoration development in connection with the Los Angeles State Historic Park, an area referred to as Chinatown-Cornfields. This general area, south of the SR110 freeway, has nearly 26,000 residents that are not particularly served by Alternative 13. According to Table 3-4 of the Appendix the overall poverty rate of this area is 22 percent. Further, Table 3-1 indicates this population is a minority population with it being 92 percent non-white. As is common in an urban area of low income/minority population, the availability of parks is scarce. This area covered by City Council District 1 ranks 9<sup>th</sup> out of the city’s 15 districts with less than 5 acres of parkland per 1,000 residents (Page 106). Alternative 13 does little to address the concerns of this area.

The selection of Alternative 13 looks to have not fully recognized the difference with Alternative 20 on a RED basis. Table 6-8 of the report indicates that the construction period of Alternative 20 would produce 9,001 jobs with wages of over \$500 million in comparison to Alternative 13 with its 1,986 jobs and \$114 million in wages, and these numbers are only for the construction.

Ecosystem restoration provides the “seed capital” for revitalization. The RED analysis of Appendix B shows Alternative 20 would spur redevelopment creating over 5,000 jobs with wages in excess of \$336 million over the long-term as compared to Alternative 13 with nearly 1,300 jobs and \$85 million in wages (Appendix B, Table 8-49).

Dr. Axt  
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Along with this redevelopment come permanent jobs. After all, businesses and houses that are constructed are not intended to be vacant. Appendix B, Table 8-53 displays the difference between Alternative 13 and Alternative 20 on an average annual basis over the life of the project. Alternative 20 is estimated to have 1,464 permanent jobs (nearly 1,100 more than Alternative 13) with wages of \$83 million (a wage differential of \$62 million over Alternative 13) on average for each year of the analysis. Of additional significance to these numbers is where the majority of the difference comes. Tables 8-43 thru 8-46 of Appendix B reveal the Chinatown-Cornfields area as the primary source for Alternative 20's greater impacts. Potential long-term economic improvements in this challenged area should be considered when comparing Alternative 20 to Alternative 13.

<b>Redevelopment Long-Term Average Annual Impacts</b>		
	Alternative 20	Alternative 13
Jobs	1,464	370
Labor Income	\$83,046,000	\$20,990,000

14

Appendix B reports,

*“In a recent Environmental Science and Technology article the authors report that there is evidence that urban residents living in greener environments may be significantly healthier than those living in environments with less green space, and the presence of water may create even greater health improvements. Most notably for low-income and minority residents, inequitable urban development and the privatization of natural amenities has contributed to environmental injustices in the distribution of green space and water features. Collectively, this can cause disparities in health-related behaviors and obesity.” (B-95)*

As documented in Appendix B, the CCPHA found the total annual estimated cost to California for overweight, obesity and physical inactivity was \$41.2 billion with \$20.2 billion of this amount attributable to physical inactivity. (B-97)

The appendix also indicates in Figure 9.5 that obesity for minority children as compared to whites can be 70% higher for Hispanics and nearly 50% for African Americans.

The Centers for Disease Control and Prevention supports the goal of creating or enhancing access to places for physical activity, the enhancing physical education and activity in schools, and supports urban design and land use policies to encourage

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physical activity. The additional and upgraded ecosystem restoration features of Alternative 20 should be considered in light of these goals, especially as there is proximity to nearly double the number of schools in this Alternative, and its physical coverage area also doubles as compared to Alternative 13.

Additional trails, access points, parking areas, and bridges are included in the alternatives. These would provide linkage and connectivity to the restoration areas as well as to existing parks, thereby improving community cohesion. Benefits would be seen under the alternatives and would provide a common place for residents of various socio-economic backgrounds to recreate and interact. This would help create a sense of community and belonging. In turn, these beneficial social effects would potentially influence the enhancement of surrounding areas to conduct similar activities. Alternative 20 with its larger scope will produce a greater connectivity with the people and communities of the study area.

14

Key benefits achieved by Alternative 20 as described above include:

- Three times more concrete removed.
- The length of restoration is two times greater in Alternative 20 than in Alternative 13 and adds more than twice the value by including additional tributary and large expanses of open space into the plan.
- More connectivity remedies the extreme biological stress caused by urbanization, fires, floods, and climate change.
- Other societal effects: environmental justice, water quality, public health, will be significantly improved with Alternative 20 over Alternative 13. This is an opportunity for the Federal government to positively affect these resources for a change.

15

Alternative 20 is most compatible with the numerous initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the Los Angeles River to habitats, species and people.

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### **The Time is Now**

Cost and construction feasibility will always be factors that hem in a plan, which why as a planning document, the ARBOR study should be visionary and recommend Alternative 20. If not now, then when? The country has little patience for public investment to re-study an area. We urge the Corps to select Alternative 20 as the final Federal plan, as it provides the greatest net sum of economic and restoration benefits. The local sponsor, the City of Los Angeles, has committed to its cost-sharing responsibilities. This is the right plan for restoring the ecosystem values that were lost by the channelization of the Los Angeles River; and the right plan for the people of Greater Los Angeles.

15

Sincerely,

A handwritten signature in blue ink, appearing to read 'Irma Muñoz', with a long, sweeping flourish extending to the right.

IRMA MUÑOZ  
Chairperson

cc: Dr. Carol Armstrong, City of Los Angeles, River Project Office  
Lewis MacAdams, Friends of the Los Angeles River

Atch: Photos of the Los Angeles River in the ARBOR study area  
(following pages)



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Page 20



# Save LA River Open Space



ALLIED WITH THE STUDIO CITY RESIDENTS ASSOCIATION

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers- Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt:

We strongly support, as do elected officials at many levels of government, that the best long term solution would be to adopt Alternate 20 for the restoration of the LA River and the LA River Watershed.

Alternate 20 removes more concrete which will lead towards creating habitat, restoring wetlands that will encourage the return of wild life and just as important, provide access for the public to the river, a sorely needed requirement for the citizens of Los Angeles and the San Fernando Valley.

The highly degraded Los Angeles Watershed must be restored not only for the above obvious reasons but also for the unforeseen benefits to future generations to come: Alternate 20 is best suited to these objectives.

The scope of restoration within Alternate 20 will not come around again: if the opportunity to go with Alternate 20 is not recommended and adopted by the Corps, it will be too late to say "I wish we had done otherwise than go with Alternative 13."

Please listen to all those who support Alternate 20.

Sincerely,

Alan Dymond

President

Save LA River Open Space

[saveopenspace@slaros.org](mailto:saveopenspace@slaros.org)

[www.savelariveropenspace.org](http://www.savelariveropenspace.org)

818-509-0230



**From:** [buckfilm@gmail.com](mailto:buckfilm@gmail.com) on behalf of [Craig Faustus Buck](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alternative 20  
**Date:** Sunday, November 17, 2013 4:11:34 PM

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Dear Army Corps of Engineers,

I am the Chair of the River Committee of the Sherman Oaks Neighborhood Council, one of the communities through which the L.A. River runs in the San Fernando Valley. Our community is extremely concerned about your stated choice of Alternative 13 for restoration of the river. We have heard from a broad cross-section of our community and the responses, from both residents and business owners of Sherman Oaks, have been overwhelmingly in favor of Alternative 20.

The greening of the river is not simply an engineering project, it is part of a master plan to rejuvenate communities along the river from the North San Fernando Valley to Long Beach. Alternative 13 ignores many of these areas and is short-sighted in terms of the economic potential of the river to revitalize Los Angeles as a whole.

Please don't deprive us of the full potential of our River.

Thank you,

Craig Buck

Chair, River Committee of the Sherman Oaks Neighborhood Council  
Council District 4 Appointee, Cahuenga-Ventura Boulevard Corridor Specific  
Plan Review Board



ANGELES CHAPTER • SIERRA CLUB

3435 WILSHIRE BOULEVARD • SUITE 320 • LOS ANGELES • CALIFORNIA 90010-1904 • (213) 387-4287 • FAX (213) 387-5383

16 November 2013

Dr. Josephine R Axt  
Chief, Planning Division  
US Army Corps of Engineers  
Los Angeles District  
PO Box 532711  
Los Angeles, CA 90053-2325

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt:

After careful analysis of the Los Angeles River Study, Sierra Club supports the Army Corps of Engineers to pursue Alternative 20 in the Los Angeles River Ecosystem Restoration Integrated Feasibility Report that was published by the Army Corps in September 2013.

Over the years, the Los Angeles River system has been degraded and has been largely lost as a utilizable recreation area. Alternative 20 would offer the greatest amount of restoration to the Los Angeles River system and allow for recreation options that have been lost. It would also bring much needed habitat restoration that would also help in the maintenance of the remaining area ecosystems. The Los Angeles River system is a vital ecosystem that needs restoration.

As our area population increases, it is important to have recreational open space areas available to millions of local area residents. Having lands just a few minutes away where you can hike, bike, or ride a horse is something that we should have for our current and future generations.

Sincerely,

Fred Dong  
Chairman of the Crescenta Valley Sierra Club for the Sierra Club





DATE: Nov. 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, CA 90053-2325

Email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

SUBJECT: Los Angeles River Ecosystem Restoration Feasibility Study  
DRAFT Integrated Feasibility Report  
Study/Environmental Impact Statement (DEIS)/Environmental Impact  
Report (DEIR)

Dear Dr. Axt,

The Water Committee of the Sierra Club Angeles Chapter has reviewed the Los Angeles River Ecosystem Restoration Feasibility Study and associated reports. Members of our committee have prepared the comments below for your review - a PDF file of this letter and all comments is attached for your convenience to print or share with other reviewers.

Thank you for the time and efforts the US Army Corps of Engineers and the City of Los Angeles have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report.

Thank you for the opportunity to participate in this vital work of LA DWP.

Regards,

Charming Evelyn  
Chair, Water Committee

George Watland  
Acting Co-Director

Sierra Club Angeles Chapter  
3435 Wilshire Blvd. Suite 660  
Los Angeles, CA 90010-1904

Attachment: Sierra Club Water Committee Comments - LA River Ecosystem Restoration Feasibility Study.pdf

## ADDENDUM

### Comments by the Water Committee of the Sierra Club Angeles Chapter

#### General Comments by William Goldstein

Alternate 20 restores 719 Acres at a cost of \$1.06B. Alternate 13 restores 588 Acres at a cost of \$444M. A20 softens 80' of river bottom @ Bette Davis Park vs. nothing for A13. Arroyo Seco is an ephemeral stream for most of the year. A20 softens a .5 mile stretch turning it into a riparian marsh and wetland. A13 does not. Overall, it surprised me that staff didn't spend more time on the water-capture opportunity offered by the LA River. 750,000 acre ft. in any given year would serve a lot of families (@ 2 acre ft./family) and would go a long way toward reducing your water bill and mine.

1

Slowing the release schedule @ Hansen Dam would capture up to an additional 16,000afy. Also, using the planned parklands @ Taylor Yards and the Cornfields as spreading grounds during the rainy season would be a budget-pleaser.

#### Economics by David Campbell

The Environmental Quality (EQ) evaluation of beneficial and adverse effects of proposed alternatives on the ecological, cultural, and aesthetic effects of the affected natural and cultural resources is the major meat of the Report. This means that the EQ benefits of each alternative will be subjectively evaluated while the dollar costs are best objective estimates. Economic reasoning has a limited role.

Contributions of the effects of alternatives that can be measured in monetary terms (National Economic Development \$) are a small part of the Integrated Feasibility Report. Recreation Benefits and Costs must be in the NED account. Not worth messing with. And, the report mentions jobs that could be created. The NED account only allows "benefits" from hiring unemployed and underemployed workers. This is done by using the difference between the wages paid (a cost) and the opportunity cost of the workers -- zero for the identified unemployed. The Report sort of overstates these benefits by using only numbers of workers. Also, I don't see discounted present values of the costs and benefits.

2

It sounds like environmental groups have subjectively chosen the higher cost alternative 20 vs. the lower cost alternative 13. I believe that one of the problems benefits of the better but higher cost projects can be that they take longer to implement and to receive the benefits. Thus, the discounted present value of the far in the future EQ benefits is small. One strategy is to look for ways to reduce the costs of #20. Incremental

analysis can help. The report does show different aspects of each alternative. When negotiating, can you create a schedule that would proceed with the ones with larger subjective beneficial effects and low costs first i.e high net benefits. Or, come up with ideas for reducing costs or giving up on a couple of the most costly parts. Maybe someone could match up the various parts of 13 and 20 and jiggle them a bit.

The Angeles Chapter of the Sierra Club is pleased with the emphasis on the study's purposes, the detailed information that it contains, and the careful evaluation of reasonable alternatives to restore much of 11 miles of the Los Angeles River. The Chapter sends out a monthly e-Southern Sierran to over 90,000 members and supporters in the area who have supported the general thrust of river restoration as well as specific proposals for many years. As you heard at the even-handed public meeting most of the attendees would love to see all of the measures outlined in Alternative #20 be recommended to the Assistant Secretary and authorized by Congress. One of our members noted that, "It was clear from those speaking at the press conference that this was a *'seminal moment in LA County history'*" as speaker after speaker spoke about the remarkable consensus around local, state, and federal support for Alternative 20." We, *and you*, understand, however, that the difficult process will take a long time. Steve Ellis of Taxpayers for Common Sense warned, "You can potentially risk not getting anything if you reach too high."

Competition for funds from presently authorized and new projects from the limited budget of the Corps is intense. See how few new projects are in the crowded 2013 Water Resources and Reform Development Act that passed the House on October 30. The Reform part of the bill requires the removal of many projects that have been on the list for more than five years. This still leaves loads of **competition** for Alternative #20's estimated Federal contribution of \$500 million. And, any Rio L A authorization will not appear until at least a year from now according to your time-table. Authorization is only a first step; then monies must be appropriated.

Local sponsors will face similar problems in obtaining their *cost-share*, especially for near-term land acquisition. Former Los Angeles Mayor Villaraigosa promised that the City would pay its fair share, but ex-Mayor Richard Riordan forecasts local budget deficits.

Friends of the L A River (FOLAR) began 27 years ago. Since then, access has been allowed in several places, sections have been improved, public support has grown, and progress has speeded up. Nevertheless, it would take another 27 years to complete Alt. 20, or even Alt #13, relying on Federal and local dollars.

The last chapter of Patt Morrison's book Rio L A is entitled, "To see the river as it was." Many steps have already been taken in this direction, some as little as clean-up festivities or bike trails. Each step has encouraged more

2

people to touch the river. Somehow the process must continue so that others can enjoy and then fight for further restoration.

## WHAT NEXT

These comments have illustrated that attempts to obtain authorization and funding for an entire package of these expensive Alternatives in one full swoop are likely to fail. Fortunately the Study does provide for a continual process and mentions that the selected alternative will be "implemented in phases".

The Sierra Club suggests that your synopsis of the final study contain timetables for chunks of these phases so that it is clear that requests for *annual* Federal contributions will be not be large. The restoration of the river piece by piece requires a ranking of the proposed segments. The study staff has already used Bang for the Buck to select the projects for each of the eight reaches of the river. It should now use the environmental quality value versus project costs to develop an EQ/Costs ranking and timetable for the each project in the selected Alternative.

The Corps should meet with FOLAR and a few other groups before November 18 to agree on the urgency of specific projects and a timetable. We don't think that you will be very far apart.

The Corps must attempt to quickly obtain federal and local authorization and funding for a couple of the top-ranked projects. It has spent seven years and \$10 million on the Study. Your time and money should not be wasted.

The Study conclusion should insist that the Corps begin restoration soon and finish the first steps quickly. The Final Study Report should make it understood that all the other pieces of the overall plan are waiting in a queue for similar actions.

2

### **ARBOR Riparian Transitions (ART)- Alternative 10**

Restores x acres of Valley Foothills Riparian and x acres of freshwater marsh habitat Restores riparian corridors in overbank areas in 6 reaches (1, 2, 4, 5, 6, and 8) Daylights fourteen streams (three streams in reach 3, seven streams in reach 4, one stream in reach 5, and three streams in reach 7) Widens the soft river bottom in reach 6 at Bowtie and Taylor Yard by twenty-four feet Small terraced area in reach 6 Restoration of historic wash through Piggy Back Yard.

### **ARBOR Corridor Extension (ACE) - Alternative 13**

Restores x acres of Valley Foothills Riparian and x acres of :freshwater marsh habitat Restores riparian corridors in overbank areas in 6 reaches (1, 2, 4, 5, 6, and 8) Daylights eleven streams (three streams in reach 3, seven streams in reach 4, and one stream in reach 5) Implements a side channel along the right bank behind Ferraro Fields in reach 3 and along the edge of Griffith Park



golf course in reach 4 Widens the soft river bottom in reach 6 at Bowtie and Taylor Yard by five hundred forty-four feet Small terraced area in reach 6 Vegetation on channel walls in reaches 6 and 7 Restoration of Arroyo Seco confluence Restoration of historic wash through Piggy Back Yard.

### **ARBOR Narrows to Downtown (AND) -Alternative 16**

Restores x acres of Valley Foothills Riparian and x acres of freshwater marsh habitat Restores riparian corridors in overbank areas in 7 reaches (1, 2, 4, 5, 6, 7, and 8) Daylights eleven streams (three streams in reach 3, seven streams in reach 4, and one stream in reach 5) Implements a side channel along the right bank behind Ferraro Fields in reach 3, along the edge of Griffith Park golf course in reach 4, and through Piggy Back Yard in reach 8 Widens the soft river bottom in reach 5 by converting from trapezoidal channel to vertical and adds width at the downstream end of the reach, and widens in reach 6 at Bowtie and Taylor Yard by five hundred forty-four feet

in reach 8 creates 500 feet of soft river bottom with 1000 additional feet on a bench at the 2 year flood interval and sloping up another 800 feet to overbank level in reach 8. Small terraced area in reach 6, and additional terracing in reaches 5 and 8 Vegetation on channel walls in reach 6 and in notching at top of channel in reach 5 Restoration of Arroyo Seco confluence in reach 7. Restoration of historic wash through Piggy Back Yard.

### **Riparian Integration via Varied Ecological Reintroduction (RIVER) - Alternative 20**

2

Restores x acres of Valley Foothills Riparian and x acres of freshwater marsh habitat Restores riparian corridors in overbank areas in 8 reaches Daylights twelve streams (three streams in reach 3, seven streams in reach 4, one stream in reach 5, and one in reach 7) Implements a side channel along the right bank behind Ferraro Fields in reach 3, along the edge of Griffith Park golf course in reach 4, and through Piggy Back Yard in reach 8 Widens the soft river bottom in reaches 2 and 5 by converting from trapezoidal channel to vertical and adds width at the downstream end of reach 5 in reach 6 at Bowtie and Taylor Yard by five hundred forty-four feet, and in reach 8 creates 500 feet of soft river bottom with 1000 additional feet on a bench at the 2 year flood interval and sloping up another 800 feet to overbank level in reach 8.

- Small terraced area in reach 6, and additional terracing in reaches 5 and 8
- Vegetation on channel walls in reach 6 and in notching at top of channel in reaches 2 and 5
- Restoration of Arroyo Seco in reach 7 and Verdugo Wash confluence in reach 3
- Restores freshwater marsh wetlands in Los Angeles River State Historic Park with a terraced connection to the main stem
- Restoration of historic wash through Piggy Back Yard.

### **Comments by Judith Anderson**

## Habitat Restoration

## Habitat Appendix

Stated, finally, the Goals for the Study. Or is it the goal for the entire ARBOR study? Not clear.

3

1. Restore Valley Foothill Riparian Strand and Freshwater Marsh Habitat
2. Increase habitat connectivity.

Objective: Restoration of the area to a condition characteristic of the historic, natural riparian river channel, as limited by ... urbanization and ... for flood risk management.

Important species: p. 12,13.

They ignored larger mammals. Mule Deer, mountain lion, bob cat, coyote. Mountain lions have been spotted in Griffith Park. Habitat stressors included horses, homeless, but ignored both feral and unleashed dogs and cats, as well as noise pollution from adjacent freeways and trains, and runoff pollutants. Trash is not simply careless disposal, but the ability of the recessed river channel to catch windblown object which became trash when they entered the channel from shopping carts to door mats. Homeless encampments are not large congregations, but typically solitary. perhaps 100 sq ft in a polygon of x acres?

4

All of the maps of habitat components, starting with Page 17 figure 6.1.1-1, are "Sample Maps"... Evaluations of the components was problematic since none of the reaches is mapped for all of the components, making it very difficult to find errors, or to compare polygons with habitat descriptions when not all polygons are shown on the maps.

5

The following comments are all that could be gathered based on an incomplete set of maps in the report: The opening implied that Los Feliz and Harding golf courses were important areas to examine. They do not appear in any polygon. Polygons on the left (eastern) bank are very limited in scope and (for example) ignore connectivity between Taylor Yard and the adjacent Los Angeles River State and City Park with its sample native habitat plantings. There is no polygon for North Atwater Park, and the Annex. Which has a bioswale channel for the urban runoff before it joins the river. On reach 6, no polygon for LA River State park, and none for Marsh Park. There are numerous areas around the Metrolink yard and especially areas to the north which deserve polygons even if they show no existing plant materials.

6

Of course there is existing habitat on Taylor Yard. The soil was all scraped away on this superfund site to remove contaminants pollutants from Taylor Yard, Inattention led to the deliberate destruction of osprey nests along the river in abandoned buildings on the west side of the parcel. I thought those

7

nest s were supposed to be protected. Nowhere is the continuous flow of water from the Water Treatment Facility in-flow from Glendale even mentioned. Nor the use of some of the treated water on golf courses in Los Angeles. Where is the evaluation of the value of this water in restoring “natural” flows? Higher flows, year-round, are not natural. What are potential impacts if alternate uses for the water are found, as the price of imported water continues to rise, and what are the expected impacts at different flow rates?

8

The hydrology section fails to describe the interaction with the local water tables except to note that the reason for the soft bottom is that the water table is too high to cover it. There is ample evidence of other high water tables not far to the east in Highland Park. They are still being exploited by bottled water companies. Is there opportunity for infiltration? The report doesn’t say.

9

Figure 6.2.1-5 Proximity to other natural areas...

The tenuous connection between Griffith Park and the Arroyo Seco needs to be protected. The study missed the opportunity to gain another strand of connectivity using Verdugo Wash to the Verdugo Mountains. Although it includes other Federal designations of land, the SMMNRA, ANF, it fails to include congressionally designated wilderness in the NW corner of Angeles National Forest. The San Raphael Hills have been nearly totally isolated from the main Verdugo Mountains. Connectivity issues are being addressed. Connectivity enhancements in the Sepulveda Pass by Cal Trans includes accommodations for species movement across the pass. Beginning studies across I-5 CA 14 S of Santa Clarita.

10

Page 7

Losses from the construction of a channelized controlled flow river with altered bottom. Should include possible loss of anadromous fish from the Los Angeles River, based on the existence of them in other streams in Southern California; Should include disruption of migration corridors of all land based species – plants, animals. The creation of “islands” increases the possibility of extirpation of species, especially those which are sensitive to disturbances and prefer more secluded habitat (eg. Mountain lion). It means the system now favors those species that are edge adapted. Loss of the top predator reverberates down the remnant ecosystem.

11

Within the “opportunities” section, there is a reference to “functioning ecological zones.” This is neither defined nor mapped, nor described as of any date. The intent of including this term is NOT clear. Is there a goal of restoring the “non-functioning” ones, or ignoring the “functioning” ones?

12

An independent study of the essential migration corridors crossing Los Angeles County has been completed. This study, its conclusions and recommendations, have been ignored.

13

## Section 3.10

Paragraph 2 describes the land adjacent to and west of Glendale Narrows as having single family and mixed residential housing. On the maps, it looks like it is Griffith Park. Griffith Park is referred to as a "recreational" area. The implication is that it provides little or no habitat suitable for wildlife, birds, reptile, etc. This is not borne out by the independent studies, commissioned by Friends of Griffith Park and others, that have been performed documenting the diversity of species in the Park.

14

## Economics/Social Justice

Page 17 Where is tourism included in the business profile for Los Angeles? Is it included in "entertainment"? Table 3.5, is nearly useless since it is not divided out into the separate segments of the river under study.

Page 19 begins a review of legally required "Environmental Justice" factors. While the statistical analysis of the census tracts, there is very little recognition of the depth of the problem or accommodations within the proposed alternatives, which can ameliorate the injustices that are present today. For example: In calculating the acres per 1000 residents, the entire Santa Monica Mountains National Recreation Area seems to have been included although it is nearly inaccessible to school age children in Los Angeles. Private or agency funded busses are nearly hopelessly overwhelmed by the the task of getting these children into the NRA; financially strapped school districts are not funding school trips. Public transportation to the SMMNRA is very limited – in routes, in schedules, in hours of operation.

There is a reference to a Trust For Public Land study of Los Angeles residents access to parks. Other sections of the study go well beyond the reference to Los Angeles being "park poor." An examination of the actual maps show that there is indeed a case of Environmental INJUSTICE and discrimination against some ethnic (racial and cultural) groups and income levels.

15

During the period of this study the City of Los Angeles changed its funding procedures for Parks and Recreation Areas within the city. Fewer dollars were provided by the City; staff were cut and hours and services curtailed. Also, new expenses were added for services previously provided by the Department of Water and Power, such as electricity for night use. The City has been increasingly exploiting the open space for commercial enterprises and services such as advertising, and fee based entertainment in areas where all activities are free, such as picnic areas. Recognizing this trend toward increasingly expensive "opportunities" means that the city has been burdening "park poor" and "low income" residents with an undeclared tax on their use of city parkland.

In terms of adding extra open space and recreational opportunities which are free, every single acre becomes even more valuable. If the situation in Los Angeles sounds bad... at 6 acres/1000 residents, add to it the truly pathetic situation in nearby Glendale where there is only 1 acre / 1000. With nowhere to go in Glendale, they add their demands to those of the nearby communities: Burbank and Los Angeles.

15

The opportunity to open up new acres along the western edge of the city and along Verdugo Wash should be among the highest priorities.

#### 5.1.1

There is a factual error concerning kayaking and fishing in the study area. There is now kayaking in the stretch of the river below the CA 2 crossing. In this stretch there are also more families having picnics, even though there are no tables, bird watching, photography, and nature study.

The map of Marsh Park seems inflated. Perhaps the map includes other land that has been purchased for park purposes but is not open to the public.

At several points the study refers to there being "NO FISHING", or fishing is prohibited, nor not permitted, and not cited. There also are NO SIGNS telling the public that fishing is not allowed. I think that's why there have been no citations.

On page 23 there is a reason given why the public doesn't use the river for swimming: "low water". That's ridiculous. I can give you about a dozen reasons why I would not advise children to learn to swim in the river. Residents know that much of the flow in the river comes from water treatment plants in Glendale and Sepulveda Basin. They don't trust the water as being safe. Perhaps they could, but that is a discussion for another time. Kayakers are advised; others don't even get that information.

16

They don't trust the bottom. They can see the trash accumulations and may have participated in River clean-up days. Glass, pieces of metal ready to go through the sole of a shoe, makes it unappealing when the bottom isn't visible. There is also a fear, in dodgy weather, when a rainstorm somewhere upstream that you neither hear nor see can unexpectedly put you in trouble. Rescues of unfortunates caught in the river make the evening news during winter storms. The long riprap slopes are not inviting for a quick escape route if you have several children. There are very few restrooms along the bike paths that make it inviting to bring families with small children, and not many trash bins either. There are no areas "designated" as suitable for swimming and wading. The reason is not "low water" but fear.

On Page 23 there is a note of the bicycle route on the western bank, but there are bicyclists on the eastern side of the river also, in the stretch of the river from Los Feliz north to at least the North Atwater Annex park. In some sections they share the bank with the equestrians, or use the flat paved area



below the side, and service roads along the bank. There are also bicyclists who reach the river bottom at the Metrolink property.

It is a true disservice to the public when it is expected to analyze output from "certified" planning software which it a) is unfamiliar with; b) has no access to the data put into it; c) is not informed about the assumptions which are built into the software. Like election results from Florida, the public needs more information on this 'certified' software.

Section 6.1.

Plagued with undefined terms, this section is difficult to evaluate. Examples: "desired ecosystem resources", "reasonable", or "reasonable with respect to Federal Objectives." Where are these Federal Objectives enumerated?

### Comments by Dr. Tom Williams

We have reviewed various accessible documents regarding the proposed "Project" and have participated in one public meeting. We request that Environmental Impact Statement/Report - Feasibility Report be revised and reissued at a later date (i.e., January 2014) with a request for additional public comments.

No Scoping Report or Comments are provided to assess the adequacy of the DEIS responses, but presumably it will be in the FEIS. No reference is made to the California's required Mitigation Monitoring and Reporting Program, again presumably it will be in the FEIS.

Adequate analyses of stormflows, stormwater retention, and infiltration/recharge have not been provided for the affected drainage of the Project and their relationships to the overall eastern SFB area and north-central and eastern LACounty drainage areas. Similarly, adequate analyses of groundwater flows, recharges, and discharges and movements and relationships with contaminated groundwater sources and plumes within the project areas or the effected drainages have not been provided nor even referenced.

Considerations were not provided on the regional transportation impacts by removal/limitations of freight transport from the Alameda Corridor and prospects by SCAGs for Alameda Corridor extensions to Palmdale and San Luis Obispo through the Piggyback and Taylor rail yards.

Many assessment sections end with a phrase that everything will be sorted out or mitigated during the "design phase" where the public would not participate. Such comments may be appropriate to an Environmental Assessment but not to an Environmental Impact Statement and Report. Therefore, the Project description, the setting based on an adequate description, and assessment along with confirmed mitigation have not been

presented for public review and therefore comments can not be fully prepared based on the current materials. The Project's description, setting, and assessment are inadequate and incomplete (see also attached detailed review comments.

Throughout the Report and EIS, costs for rights-of-way and remediation of hazardous/contaminated soils and groundwaters are mentioned and assigned to the City of Los Angeles as the responsible sponsor agency. However, the City as the local Project Sponsor has not adequately or completely developed a setting, assigned project activities, facilities, and impacts, considered mitigation of these hazards and their costs/economic impacts and the dislocation of financial resources to these facilities and activities from those that may have much higher returns on recreational and environmental benefits and far less risk of unfunded costs for as yet unknown but certain presence of contaminated soils and groundwater.

24

Binding contracts or memorandum of agreement or understanding between the City and affected Railroads have not been provided or referenced, and thereby remedial, financial, and other conditions for rail yard usage remain at significant risks of unknown significant impacts to water resources and quality, hazardous wastes remediation, recreational resources and other sectors.

Similarly the allocations of scarce City financial resources for this one project would require deferral or abandonment of funding for operations and maintenance of existing open space and recreational resources and for any new facilities and space elsewhere, where needs remain high. Such financial dislocations, reassignment, or abandonments have real impacts on environmental justice issues within the City's complex and wide ranging culturally and financially diverse communities.

25

No considerations have been focused on any documented relationship of the current owners of the Taylor and Piggyback yards and facilities nor on the repeated use of trestle for relocated train corridors on both left/right backs and yards in the Project Alternatives areas. A signed MOU or similar binding commitments must be provided to support various unfounded claims.

26

No consideration has been provided for cumulative effects of this project (and its alternative) in conjunction with the LACo stormwater management system, LACo recycled water programs and local flows, LACityDWP recharge of recycled waters, diversion of recycled brine wastewaters out of the basins, groundwater remediation, and other LACo and LACi projects.

27

No consideration has been provided regarding recreational and other improvements north of the SR-2 compared to those south of SR-2 and potential effects under Environmental Justice. No considerations of gentrification and low income dislocation and related growth inducements

28

have been analyzed for the Arroyo Seco, Cornfields, and Mission Road corridor of USC/LACo Medical Center (the Piggyback service area).

As indicated by these general comments and elaborated in detailed comments attached, the DEIS, feasibility report, and Project/Alternatives descriptions are inadequate, incomplete, and based on unfounded conjectures which do not provide the public with the basis for recommending and supporting a "Locally Preferred Alternative".

The available documents are incomplete, inadequate, non-objective, and include many errors, erroneous assumptions, and unsupported conclusions in a vain attempt to justify some as yet ill-defined project.

29

The documents must be substantially revised and upgraded before complying with minimal requirements for Federal, county, and municipal considerations and decisions.

Please review, revised, and recirculate this DEIS, Feasibility Report, and Project/Alternatives Descriptions.

Thank You for this opportunity to review and comment upon this important Project. We support the overall concept of the restoration of waterways but require full and objective disclosure of impacts and adequacy and completeness of supporting documents.

## DETAILED COMMENTS

COMMENT FORMAT - Text A-p./parag. or Appendices A-p./parag. and relevant text contents provided for convenience of reader

30

**City** refers to focus-point of following **comments**

Executive Summary - p.xvii - xxxv

***All portions of ES must be assumed to be based on the full text or the sections below and their supporting appendices. If the Appendices or EIS-texts are incomplete and inadequate, the dependent higher tiered text and Executive Summary must also be considered as incomplete and inadequate.***

### xxxv/3 ES.9 Conclusion and TSP Identification

The increased benefits for habitat value, habitat connectivity (nodal and regional), restoration of hydrologic processes, and aquatic ecosystem restoration provided by alternatives 16 and 20, including the increase in RED benefits attained by these two larger alternatives make them **reasonably acceptable and supportable alternatives**. However, these added benefits also come at a **higher relative increase in costs**. Comparing cost to relative benefits gained, for a much smaller increase in costs over Alternative 10, **Alternative 13** includes : ***[elements separately/emphasized below for clarity]***

31

all the features of 10 and  
 adds side channel restoration and floodplain connection in Reach 3,  
 additional natural river bed in Reach 6,  
 a natural channel confluence in Reach 7 with riparian vegetation lining  
 channel walls, and  
 a **significant increase of 309 percent** in nodal connectivity  
 as well an increase in regional habitat connectivity.

This alternative provides the **greatest increase in net benefits...for the least increase in cost** while **reasonably** meeting the objectives...meets all of the Principles and Guidelines criteria as an effective, efficient, complete, and acceptable plan.

***Comparative adjectives are scattered throughout the EIS without any specific definitions and without reference to any quantitative measures for such usage.***

***Significance and accuracy of "309" has not been established and requires reference to the pertinent text section.***

***References between benefits and costs may be appropriate for the feasibility study aspects but opens the entire EIS to fiscal, financial, and economic reviews and comments regarding environmental justice as all LACity residents will pay for the Project but not receive equal benefits and may have more beneficial open space, recreational, and environmental projects and operations and maintenance of existing resources deferred, delayed, or abandoned.***

31

1-12/2 This feasibility study provides an **interim** response...study efforts will determine the feasibility of ecosystem restoration...**There is no sponsor available to investigate flood risk management at this time.**

***Current flood control risks are estimated at less than a 25 year flood, elsewhere in the report and EIS. Therefore another project can be assumed sometime in the future to deal with the absence of flood risk management efforts at this time. No estimates nor concept designs for flood risks at 100 year flood are provided, and no consideration of project segmentation is made.***

***The integrated EIS and feasibility study are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of water-consumptive vegetation and inducement for liquefaction throughout the Project area.***

32

1-16/1 - 1-17/1 **1.4.2 Individual, Local, and Agency Reports**  
***No groundwater studies are referenced although conducted by federal, state, and local jurisdictions.***

***The integrated EIS and feasibility study are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of water-consumptive vegetation and inducement for liquefaction throughout the Project area.***

33

1-17/2 **1.4.3 Concurrent Studies**

- None of the boundaries of these studies overlap with this study's project area

**No SFB groundwater related studies**

***The integrated EIS and feasibility study are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of water-consumptive vegetation and inducement for liquefaction throughout the Project area.***

34

1-17/3 - 1-19/5 **1.4.4 Details of Selected Background Reports**

***No groundwater studies are indicated at all, although three major SFBasin and groundwater projects (Stormwater Recharge, Recycled Recharge, and Contaminated Groundwater), and the County's/Watermaster's studies and hydrological model would incorporate such groundwater sectors and have been underway for years.***

35

***The integrated EIS and feasibility study are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of water-consumptive vegetation and inducement for liquefaction throughout the Project area.***

2-2/1 During the dry season, **base flows**...often less than 100 cfs and are entirely composed of discharge from municipal and industrial wastewater treatment plants and urban/irrigation runoff.

***In this section and elsewhere similar comments are made without supporting records, models, or references with regard to the amount of groundwater discharge to or recharge from the River channel.***

36

***The integrated EIS and feasibility study are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater relationships with the channel flows.***

2-4/3 -2-7/1 **Hydrologic connections** may be made naturally...reshape the adjacent floodplain area...**natural connections** support contiguous aquatic and riparian habitat...via restored corridors. **Natural hydrologic connections** also support aquatic processes...**Connections** may also be made through...using river water to feed overbank sites...supporting **other** ecological processes and exchanges. **Hydrologic and hydraulic connectivity**...restore **underlying processes** that support a functioning ecosystem, to reestablish habitat patches and corridors, and to reduce the habitat fragmentation created by urbanization...

37

***The most natural and strongest hydrologic connection within the River valley, channels and floodplains, is the Surface/Ground Water connection which the EIS and IFS fails to provide, discussion, assess, or mitigate.***

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***



2-7/2 **2.2 DESCRIPTION OF STUDY REACHES** ...eight geomorphically different reaches...defined based on the physical characteristics of channel morphology, bank characteristics, soil exposure, existing habitat, and surrounding land uses. Specific geomorphic criteria include: (1) channel bed type (either soft bed with groundwater/surface water exchange, or concrete)...

***One of the few mentions of groundwater in both Sections 1 and 2 but without regard to the relationships of the groundwater above the SR-134, between the SR-134 and the SSR-110, and below the SR-110 of the Project area.***

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

37

2-7/3 ...small temporary dam within the river bed near the upstream end of this reach that was once used to help divert water to the Headworks spreading grounds operated by...LADWP).

***A second vague reference to the important of groundwater resources and their relationships to the surface and subsurface conditions of the River valley from the San Fernando Basin to Downtown LA.***

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

38

2-17/4 8. ...inability of surface flows to infiltrate and recharge groundwater aquifers, which is necessary to restore native flow regimes and support native habitat communities;

***The EIS does not provide supporting documents, modeling results, or other studies to consider the statement made.***

***Riparian habitats and habitats and vegetation adjacent to the concreted "impervious" channels may suggest that although relatively impervious leakage does occur or that various section can recharge the underlying groundwater tables and aquifers sufficiently to maintain some trees and related riparian habitats.***

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

39

2-18/2 The primary stressors on the habitats include:...and 4) disruption of natural river to floodplain connections and river/floodplain to groundwater connections.

***The most persistent connection and support for riparian, wetland, and aquatic habitats is the groundwater and major studies throughout the Southwest US have demonstrated this connection***

40

***which is not considered throughout the EIS and IFS. Furthermore the connection and interplay between the surface and ground water regimes are often not considered along the entire Project reaches, from above-to-below the SR-134 and the SR-110 which connect vastly different surface and subsurface hydrologic regimes.***

40

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

2-18/Figure 2-12 Conceptual Model Depicting the Study Area

**Groundwater**

***In the Figure, groundwater is considered in isolation in the Project vicinity from the regime in San Fernando Valley and that below the U-101 which are all fully connected and dependant.***

41

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

2-19/Table 2-1 Conceptual Model Components

**Groundwater** Elevation of and connections between **groundwater table and river and floodplain habitats**

Impervious surfaces Development has led to primarily impervious surfaces in the uplands adjacent to the river preventing **groundwater interactions** and promoting rapid runoff of precipitation...

***Although mentioned herein this table, groundwater is largely and erroneously ignored in EIS text, descriptions, assessments, and mitigation and in supporting appendices and references. Some similarly isolated studies of groundwater for stormwater and recycled water recharges and for contaminated plume migration have not considered the baseflow discharges to the Project reaches and their effects on the proposed Project of this EIS/IFS.***

42

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

3-1/2 **3.1 GEOLOGY, SEISMOLOGY, SOILS AND MINERALS** Appendix D also describes geotechnical constraints associated with each alternative as well as provides **recommendations for future stages of study and design.**

43

3-5/5 Liquefaction is caused when the ground shakes **wet granular soil** and changes it to an unstable **liquid state**. Areas prone to liquefaction have **thick alluvial soils that are poorly consolidated**...in the study area...all lowland areas along the Los Angeles River and tributaries...high liquefaction

potential along the foothills...in Reaches 1-3, in Reaches 4-6,...in Reaches 7 and 8

***Wet granular soils usually reflect high groundwater levels which are common along rivers and streams, and as indicated the entire length of the proposed Project. Similarly flood assessment often find that the river-support high groundwater table can pressurize groundwater flows into the assumed "levee protected floodplain" and generate "blowouts" and "soil boils" which is another form of liquefaction which most California geologists are not experienced with.***

***The integrated EIS and IFS are seriously flawed, inadequate, and incomplete with regard to an overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area.***

43

**3-25/1 3.4.3 Surface Water Quality** Water quality...affected by point source and non-point source pollution entering tributaries and the main channel of the River...**Nearly 70 percent of the volume** in the River is from Water Reclamation Plant tertiary-treated effluent discharged outside of storm events (**Ackerman 2003**). Although **groundwater interactions exist (particularly in the Glendale Narrows and Arroyo Seco tributary)**, the majority of storm drain discharges are believed to arise from urban discharges.

***Let us assume that the groundwater thereby represents up to 30% of the dry weather flows and perhaps more during storm conditions and at the north and south ends of the Narrows (SR-134 - 110). Such recharges to and discharges from the channel or groundwater would be significant but are not described, assessed, or mitigated elsewhere.***

***As above, The integrated EIS and IFS...***

44

**3-74/1** Piggyback Yard is a modern railroad freight transfer yard. The USACE's HTRW survey found no records of any active or open CERCLA HTRW concerns or actions associated with this property. However, the **City of Los Angeles has indicated that there are remaining HTRW concerns regarding the Piggyback property.** In a **1953 USGS topographic map**, a portion of Piggyback Yard is identified as a railroad maintenance yard, the same identifier used for Taylor Yard. Because **Piggyback Yard and Taylor Yard were in use as railroad maintenance yards at the same time, similar activities likely occurred on both properties.** Also, historical maintenance activities were the source of much of the contamination at Taylor Yard. Therefore, although there is no record confirmation of HTRW issues at Piggyback Yard, **some** HTRW is likely to exist at the site.

***As a federal-jurisdiction facility, hazardous waste investigation may not be undertaken unless the facilities are transferred to other jurisdictions.***

***Earlier maps and aerial photos are available and vital to risk assessments for the project (1894, 1908, and 1909 Illustrated***

45

**Map <http://www.bigmapblog.com/tag/los-angeles/>; Pierce's Los Angeles Birdseye View, 1894; no railroad yard is shown; Security Savings Bank Map of Los Angeles, 1908). Other documents clearly indicate Taylor Yard was operational in 1925-35, 20 years before the USGS reference.**

**Open spaces with no indication of yard, but main line tracks shown, which was traditional depiction of complex rail yards.**

**Birdseye View Pub. Co.'s Birdseye Map of Los Angeles (1909); full Piggyback Yard development shown but nothing is shown for Taylor Yard.**

**The proponents/preparers of the EIS have not undertaken an objective and full disclosure of the historic railroad and industrial development and activities along the river and their potential for contaminations of the sites and underlying groundwater.**

**The integrated EIS and IFS are totally and importantly deficient regarding the historic uses and developments of the two railroad yards, Taylor and Piggyback. Comparisons are erroneous and the EIS has not researched the historical development of the Piggyback Yard even when available within one hour "Google" search of the internet.**

45

p.3-75/2 - 6 **Reaches 7-8** LADWP above-ground transmission lines run along the **right [west] bank of the River until just south of Main Street**, where the lines cross the River and run along both banks for the remainder of this portion of the study area. No...substations are in or near this portion of the study area (City of Los Angeles 1996).

**Left (east) and right (west) bank hi-voltage power lines begins just south of the Arroyo Seco Channel confluence and continue south pass US-101 bridge.**

**Bank : margins of a channel are called right or left as viewed facing in direction of the flow.**

**[http://www.nws.noaa.gov/om/hod/SHManual/SHMan014\\_glossary.htm](http://www.nws.noaa.gov/om/hod/SHManual/SHMan014_glossary.htm)**

**Figures 3-21 and 3-22 show power lines on left/east bank - left when facing downstream/south and crossing to right/west bank at Main.**

**One small substation is located at the northern edge of the Piggyback Yard on the east side of the Lamar Str. entrance.**

**No provisions are made for replacement of hi-voltage power line foundations. As all utilities may require replacement/relocation for the Taylor and Piggyback Yards, a thorough inventory of above and below ground utilities must be provided based on reviews of relevant agencies documentation rather than a cursory vehicle survey of the sites.**

**EIS and feasibility report must be revised and reissued as a supplemental or revised project description, feasibility assessments, project costs, and EIS.**

46

**3-24/1 [Flood protection]** upgrades within the study area were not found to be economically justified in the 1992 review. Therefore, the flood risk management design conveyance capacity remains far less than the 1% ACE. Existing vegetation within the channel further decreases the conveyance capacity below that of design.

***Such statements are arbitrary and subjective as they do not provide any significant informative content EIS. Confusion is created by not saying what the flood protection levels are under the existing design and existing conditions.***

47



p.15-5/ **15. INDEX** methane zone, 5-132

***Index in error, TOC-5.18 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES 5-126***

***Last page of section - p.5-127***

***TOC-6 COMPARISON OF ALTERNATIVE PLANS 6-1***

***Many others occurrences of "methane zone(s)" exist as indicated herein. above.***

***Lack of quality control and proofing is a serious issue for completeness and adequacy; other errors have been noted but limited in comments within the timeframe for public comments.***

48

#### **p.4-7/2 4.4 ALTERNATIVE DEVELOPMENT AND EVALUATION**

**PROCESS** The alternatives formulated during this study...not plans for actual construction, nor...of sufficient design detail to be constructed. Detailed design analysis and preparation of plans...begin following the completion of the Integrated Feasibility Report...***and*** the EIS)...formulated to a level of detail **sufficient to determine economic feasibility** and **potential cost-sharing, technical feasibility, environmental feasibility,** and resource issues associated with implementation...

***As presented the conceptual plans do not provide the levels of details for and have avoided risk assignments for serious issues of groundwater hydrology and rising baseflows and water levels, of hazardous materials likely to be encountered with incorporation of railroad rights of way and yards (the Taylor Yard, the east and west bank channels to Cornfields, Arroyo Seco, and Piggyback Yard, and the Piggyback Yard), and of discharge of the southward migrating SFB contaminated groundwater plume into the Narrows. As the City would be required to deal with and pay for the hazardous materials remediation, current plans cannot reasonably assess the potential and magnitudes of cost sharing between Federal, County, and City financial resources.***

***The technical feasibility and related costs of controlling the SFB plume migration is under study but has not been documented nor assessed by current City and DWP programs. Similarly the relocation of existing railroad tracks to trestled structures for both mainline tracks and yards has not been documented between the City and relevant railroads.***

***Environmental feasibility requires establishment of a baseline for contaminated soils and groundwaters beneath the Taylor and Piggyback Yards and the left/east and right/west backs beneath the railroad mainline track rights-of-way.***

***Therefore, the EIS and IFS cannot be considered as complete and adequate at the current levels of documentation and assessments. The IFS must clearly assign the risks and costs of risks realized before approving continued progress along required process.***

49

**4-14/5** This measure would provide some incidental water quality and recharge benefits. **Preliminary design** includes excavation of a basin that would have an **impermeable layer of either geotextile or fine materials installed**. The basin would then be planted with wetland vegetation. Average depth of the basin is assumed to be 3-feet and there would be some deeper areas up to 10 feet deep. It was assumed that this measure would provide 25 percent riparian habitat and 75 percent wetland habitat, resulting in one to two structural layers.

***Costs were established based on Conceptual Designs not Preliminary Design, although typical EIRs under CEQA typically require at least preliminary designs for complete and adequate assessment. Under NEPA, the CoE typically conducts an Environmental Assessment for conceptual designs and EIS for preliminary or better designs. In this EIS, conceptual design elements have been developed, only, and costs and environmental assessments are based on conceptual designs. Such use renders the EIS and feasibility study as incomplete and inadequate with very high risks of significant financial, fiscal, and economic impacts on the City of Los Angeles.***

50

**4-56/2 4.14.3 Alternative 13...**restores a total of 588 acres...there would be **six** reaches with restored **riparian corridors** in **overbank areas** (1, 2, 4, 5, **6, and 8**). Restoration features in each reach are described below...

**4-57/2 Reach 7 Arroyo Seco/Los Angeles River State Historic Park** In **Reach 7**, the Arroyo Seco tributary would be **restored with riparian habitat**...At the confluence on the upstream edge of the River, a backwater **riparian wetland** would be established. Within the River channel itself, the **banks** would be **restructured to support vegetation on the banks**. This reach subplan was the most incrementally cost effective with the most benefits for Alternatives 13 and 16.

51

***Statement on first page is not borne out by the development planned for Reach 7 unless riparian "corridors" is defined differently from "riparian habitats" on the linear banks rather than "overbank areas". The preparers have not clearly and consistently defined and used riparian units.***

**4-22/1 4.7 COSTS** Cost estimates were developed based on the **conceptual designs** developed for the measures, as described above. Appendix C, Cost, describes **assumptions**, unit costs, and price levels developed for the measures and alternatives.

**4-22/1** Cost estimates for the **Preliminary Array** ranged from a high of \$3.9 billion dollars for **Preliminary Alternative 1**: Comprehensive, which included \$1.5 billion in estimated tunneling costs (the tunneling estimate did not include LERRD for tunneling) to \$211 million for Alternative Preliminary:

52

**4-22/1** Taylor Yard. These estimates were done for each **preliminary alternative** and each reach. They included construction, mobilization (7.5 percent), tunneling costs if any (without associated LERRD), a 25 percent

contingency for construction, **preliminary engineering**, and design with engineering during construction estimated at 11 percent, and supervision and administration costs of 6.5 percent. The estimate for interest during construction was 6.5 percent.

***Use of conceptual designs for the City-financed elements is not appropriate for CEQA, especially when repeatedly conditioned with comments that further design and planning are required and some changes may result in significantly higher levels of construction and costs.***

***In the same paragraph, the Conceptual Designs are then transformed to Preliminary Arrays and Preliminary Alternatives for cost estimates. The preparers appear to be confused and have not portrayed Preliminary Cost estimates based on Preliminary Designs; all of which cannot be bid nor documented.***

***Some differences are suggested when citing contingencies for design with engineering during construction and preliminary engineering rather than design.***

***The levels of design for such a complicated but integrated program are totally inadequate and incomplete, especially for the hydrological and hazardous materials sector, and are not supported by independent studies specific to the Project.***

52

The real estate estimate was **based on the GIS mapping**...and included **business relocations cost** for Verdugo Wash and **Piggyback Yard** and a 20 percent contingency. Operations and maintenance costs were estimated and annualized for each alternative and reach. A matrix displaying the costs of each of the **preliminary alternatives**...

***No documents or files were provided for the GIS mapping***

***No supporting documents, e.g., MOU or MOA between the City and relevant railroads, was provided for relocations of Piggyback (12 sets of track of 2500ft each, = 35,000linft) and the double-sets of track through the Reaches 7 and 8.***

53

4-22/3 **4.8 FORMULATION OF SUB-REACH PLANS** Once the **preliminary array** of alternatives was formulated,...**preliminary array** into sub-reach plans...**preliminary alternatives** incorporated combinations of **measures** that varied substantially...based upon existing geomorphology and **opportunities and constraints**...each alternative represented a combination of alternative **features**,...to ensure that the best possible combination of **features** was identified, based upon **cost effectiveness** and **incremental cost analysis criteria**.

Sub-reach plans would consist of the **measures** included in **each geomorphic reach** of each alternative in the preliminary array...allowed recombination of the sub-reach plans and comparison of **those newly formed hybrid plans to the** 4-23/1 **preliminary plans in the economic analysis** to ensure that the **most efficient plans** were carried forward into the final array.

54

***As a feasibility document and supporting EIS, consistent use of standard engineering and design terms is mandatory and must be based on some CoE glossary for preliminary, conceptual, array, alternatives, measures, opportunities, features, geomorphic/hydrologic/project reaches, hybrid plans, efficient plans, etc.***

54

5-4/Table 5-1 Alternative 16 **Construction Impacts** Construction activities...over **624 days** and the number of daily worker commute trips would be approximately three times as many as Alt. 13. In addition, **existing railroad alignments (left bank) would be raised onto trestles through Piggyback Yard**...require temporary closure of the affected portion of the railroad line and rerouting of traffic using this line...delays for the rerouted rail traffic and for rail traffic on the lines to which traffic is rerouted. This short-term impact would be significant, since it would be difficult to find sufficient capacity on other rail lines to reroute freight, passenger, and **high-speed rail trains** while the trestles are being constructed.

***The preparers apparently do not realize that the riverbank mainline tracks branch from the riverbank eastward on north side of Piggyback to serve the San Gabriel Valley UPRR mainline tracks (aka, Alameda Corridor East) and on the south side of Piggyback for Metrolink to the San Gabriel Valley, after passing along trestle through the recreation area and under Mission Road.***

***No re-routing for the San Gabriel Valley lines can be done without new track works to serve the same corridors. These will not be short-term nor limited in any manner for rerouting.***

***The existing and/or relocated mainline tracks would not be used for any high-speed rail trains; unfortunately this indicates the level of adequacy of the preparers rather than the impacts of the project.***

55

5-4/ Table 5-1 Alternative 20 **Construction Impacts**...Additional impacts would result from raising an additional railroad trestle **(right bank) through Piggyback Yard**...greater short-term significant adverse impact to rail transportation...by requiring an **additional temporary closure and rerouting of traffic**...short-term significant adverse effects but no long-term effects.

5-72/3 ....**temporary closure of the affected...railroad line and rerouting of traffic** using this line, which would result in delays for the rerouted rail traffic and for rail traffic on the lines to which traffic is rerouted. This short-term impact to rail traffic would be significant, since it would be difficult to find sufficient capacity on other rail lines to reroute freight, passenger, and high-speed rail trains while the trestles are being constructed.

***Railroad trestles would be placed on both left and right banks, and the left bank passes by the Piggybank Yard but the only trestle on the west/right bank would be related to the Cornfield channel***

***north of the Piggyback Yard. Trestles are not required opposite to the Piggyback Yard and 3300ft further north/upstream. Presumed rerouting of mainline rail operations cannot be validated at this time as the railroad's have not provided permission, agreements, or understandings as to the Project's impacts upon their operations and proposed facilities. The IFS only provides that whatever the costs and liabilities are, they are assumed by the City of Los Angeles. Such assignments have far greater short and long term impacts than the EIS implies. These considerations, impact assessments and comparisons are totally inadequate and incomplete.***

55

5-10/6 Alternative 16 (AND) *Construction Impacts* ...restoration measures that would cover a larger portion of the study area in comparison to Alternative 10...include the **relocation of existing railroad tracks to trestles, construction of planter boxes built into channel walls, and channel bed deepening**...Construction impacts would be similar to those occurring under Alternative 10 and 13, but would include **larger footprints of disturbance at Verdugo Wash, Taylor Yard, the Arroyo Seco confluence, and Piggyback Yard**...

56

5-11/1

- Demolition and excavation of channel walls to construct **vegetated planter boxes**,
  - Demolition and excavation to **deepen channel bed**, and
  - Demolition and excavation of **old railroad features and construction of trestles** for relocating the railroad above the restoration area.
- No descriptions of the bank-side and trestle tracks, especially for the Cornfields channel, has been provided to demonstrate the relocation feasibility compared to those adjacent to the yards.***

**5-40/2 5.4.2 Significance Criteria** ...thresholds of significance...based on CEQA guidelines....:

- Creation or contribution to runoff that exceeded the capacity of existing or planned stormwater drainage systems or introduced substantial additional sources of polluted runoff,
- Located housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map,
- Increase in the water surface elevation of peak flows in the River,
- Substantial changes to the amount of surface water in the River, including both diminished or increased flow,
- Created pollution, contamination, or nuisance, as defined in Section 13050 of the California Water Code,
- Caused regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control plan for the receiving water body,
- Reduction in yields of adjacent wells or well fields (public or private),

57



- Adversely altered the rate or direction of flow of groundwater, or

***Relocation of current containers-transfer facilities and rail lines from the Piggyback Yard will require major land use changes from current probably agricultural or open space lands to much more impervious logistics uses.***

57

***Current channels do not provide 100-year flood protection, and thereby although large financial resources are allocated no improvements would occur.***

58

***As indicated elsewhere, no reasonable estimates have been provided regarding the migration of the SFB plumes into the Narrows and presence of contaminated soils and groundwater related to the Piggyback Yard and beneath the mainline tracks to be relocated to trestle all of which could result in pollution release of contaminated materials and waters or in extraordinary financial resources.***

59

***Current contaminated groundwater production may be increased by other groundwater projects which have not been adequately modeled or assessed and which have not been assessed as to how this Project would affect or be affected by their impacts on groundwater resources. As the IFS/EIS have not presented adequate and complete analysis as to protecting groundwater production and to current and future groundwater flow rates and directions/circulation, the IFS/EIS cannot verify protection of groundwater resources and conditions and thereby must assume that unforeseen production reductions and significant changes in flow rates and circulation would occur.***

60

5-43/6 Water quality pollutant removal mechanisms...include physical and biological...removal of pollutants through adsorption, absorption, filtration, and ultraviolet **disinfection**. Adsorption allows for a pollutant to bind to another substance through adhesion and thereby be removed from the environment...Absorption allows for uptake of a pollutant, when it is incorporated into **vegetation (nutrients)**...Ultraviolet disinfection occurs when ultraviolet rays are used to kill microorganisms (indicator bacteria).

***Preparers apparently are not experienced in suspended and attached media bacterial decomposition and clay chemistry, where the bacteria attached to emergent vegetation is vital to surface water treatment and clay adsorption is vital to pollutant stabilization. Disinfection may greatly disrupt natural bioremediations and chemical changes could easily released fix metals and other pollutants.***

61

***This assessment is inadequate and incomplete with regard to environmental chemistry and lacks any technical information specific to any reach within the Project.***

5-43/7 Alternative 10 **Biological removal includes phytoremediation and bioremediation**. Phytoremediation...using plants to remove, transfer, stabilize, and destroy environmental contaminants...Bioremediation...using

62

5-44/1 **biologic organisms** to remove, transfer, stabilize, and destroy environmental contaminants...

***All bioremediation includes phytoremediation along with zoo- and bact-remediation. Similarly I am unaware of non-biologic organisms. All plants and fungi are biologic organisms. Therefore the statements related thereto are erroneous.***

62

5-44/7 **Alternative 16 (AND) Construction Impacts** In comparison to Alternative 10 and 13, Alternative 16 proposes **additional significant restoration measures** over a larger area of implementation within the project area, with a larger footprint of disturbance at Piggyback Yard. The additional measures include:

- Demolition and excavation of channel walls to create terraced banks in Reaches 5 and 8,
- Demolition and excavation to deepen channel bed in Reach 5, and
- Demolition and excavation of old railroad features and construction of trestles for relocation of the railroad above the restoration area in Reach 8. Hydrologic features, water quality, and groundwater resources would **not be significantly affected** by restoration measures under Alternative 16...over a larger area, increasing the potential for construction impacts; Alternative 10, BMPs would help prevent potential construction impacts.

**AND**

5-45/1 **Alternative 20 (RIVER) Construction Impacts...**restoration measures over the largest area...Restoration measures...would also include the widening of Verdugo Wash in Reaches 3 and 4 and channel reshaping/widening restoration measures in Reach 2...impacts..., both adverse and beneficial, would be similar...but would be more extensive due to the increased area...

5-45/2 **Operational Impacts** ...Alternative 20 would not significantly affect **hydrologic features, water quality, and groundwater resources**, and would be the same as those under Alternative 16, but would occur over a larger area, again providing an incremental increase in **overall benefits**.

63

5-73/1 ...under this alternative, existing railroad alignments would be kept at grade but put onto trestles in Reach 8 on the left/**east** bank south of Main Street to Cesar Chavez Avenue through Piggyback Yard, with excavation below the existing grade...raised onto trestles on the right bank between North Spring Street and North Broadway....to provide right-of-way for additional channel capacity and space to implement other restoration measures. This would require **temporary closure of the affected portion of the railroad line and rerouting of traffic using this line**,...result in delays for the rerouted rail traffic and for rail traffic on the lines to which traffic is rerouted. This short-term impact would be significant, since it would be difficult to find sufficient capacity on other rail lines to reroute freight, passenger, and high-speed rail trains while the trestles are being constructed.

***Throughout the IFS/EIS, no soil sampling/analyses have been provided for the walls and banks of the channel where railroad have been located for 100 years. Many, most railroad rights of***

**way (RR-ROW) are known to have been contaminated by leakage and spills and it only takes one quart in one cubic yard to make it a hazardous waste. General presumption is that the RR-ROW is contaminated until proven clean.**

63

**Conversion of channel walls may be done without problems if no RR-ROW is associated with it, but the IFS/EIS has not demonstrated any evidence to prove the character of the soil or even the groundwater beneath it. This represents an unfunded, unknown risk to the public and the environment of the City of Los Angeles.**

**No evidentiary/factual basis is provided for claims of "no significant effects" in the text and related appendices. Further comparisons of alternatives cannot be undertaken without definition of such risks to water quality, mobilization/exposures to hazardous materials, air emissions, financial/fiscal conditions, and environmental justice.**

64

**Closure, rerouting, and delays for the mainline railroad tracks generally indicates that the preparers are unfamiliar with laws and regulations and court/case histories when dealing with the mainline railroads. Absence of any reference to or supporting documentation of agreements with the railroads clearly indicates the inadequacy and incompleteness of the IFS/EIS. The railroad will not allow such delays or disruption and will require many measures herein not discussed, not assessed, and not funded.**

65

5-54/6 Alternative 16 Local wildlife movement within the study area would be additionally improved by **restoration of a natural hydrologic connection** at Piggyback Yard...to reconnect the river to the historic floodplain. Due to the large size of the restored Piggyback Yard habitat (approximately 90 acres) **[3.9Msqft 1000x 3900ft, but other areas refer to 100+acres]**, the connection to the River...allow the **site to serve as a source population** for other restored habitat areas along the river and minimize the risk of local extinction in smaller areas. The restored channel bed...provides a habitat corridor that connects to other habitat areas in the study area, which promotes wildlife movement and prevents inbreeding depression.).

66

5-72/3 ...existing railroad alignments...kept at grade but placed onto trestles in Reach 8 on the left bank south of Main Street to Caesar Chavez Avenue through Piggyback Yard, with excavation below the existing grade...trestled...for additional channel capacity and space to implement **other restoration measures**.

**Wildlife movement maybe "improved" but in no manner can the restored hydrologic connection be considered as "natural" under a maze of railroad trestles and overlying train traffic and assumed container transfers.**

**If the entire Piggyback site is restored, trestle would still encircle three sides of the site with the 60,000+ vehicle I-5 and Mission Road along the fourth side. The 3-4 line trestles would be massive structures with considerable noise issues for the "wildlife".**

67

***This paragraph and related comparisons and "natural" and "habitats" involving the Piggyback Yard, Taylor, Cornfields, and Arroyo Seco "habitats" and bank side mainline railroad tracks (2-6 sets of tracks) are totally without supporting documentation and expert analyses.***

68

5-112/1 **5.14 CUMULATIVE IMPACTS**

**5-113/3 Boyle Heights Community Plan** In the City of Los Angeles, the Boyle Heights Community Plan, which includes portions of Reaches 7 and 8...promoting new businesses, preserving existing industrial uses, preserving and creating affordable housing, and promoting new and expanded park and recreational opportunities...

***BHCPlan does not include Reach 7 and large parts of Reach 8, northern border is the north boundary of Piggyback Yard.***

***No reference is made for the NELA Community Plan nor USC/LACounty Medical Center Master Plans.***

***The IFS/EIS are totally deficient, inadequate, and incomplete with reference to all cumulative impacts, especially with regard to groundwater resources, contaminations, and conditions and to presence/absence and conditions of methane, hydrogen sulfides, and other hazards, liquefaction within the Project area and the individual reaches.***

69

5-117/1 **Cornfield-Arroyo Seco Specific Plan** The Cornfield-Arroyo Seco Specific Plan will guide the future development of the Arroyo Seco area within and adjacent to Reach 7...The specific plan area would encompass the River channel for several miles...

***Reach 7 only is 1.1miles of the River and the total River frontage of the CASP is 1.4 miles. The proposed Project and any channel connecting the River and Cornfields would be in conflict with the Urban Village zoning along the west side of the west/right bank railroad tracks to become trestles.***

***The IFS/EIS are in error(s) and totally deficient, inadequate, and incomplete with reference to all cumulative impacts related to landuses in this specific Reach and location.***

70

5-117/5 **5.14.2 Cumulative Impact Analysis** ...discusses the impacts of the alternatives when considered cumulatively with impacts of other past, present, and reasonably foreseeable future actions...

***The IFS/EIS does not discuss the LA City's stormwater recharge ("Prop O"), floodplain, contaminated groundwater, or recycled recharge projects, nor the bridge replacement programs, and therefore both are totally deficient, inadequate, and incomplete with reference to all cumulative impacts within the Project area.***

71

5-121/3 **Cumulative Impacts- Transportation** The restoration measures...could result in cumulative impacts to current and planned

72

**rail operations**. Various commuter and passenger rail projects, such as the Metrolink's Metro Gold Line extension and the **State-sponsored high-speed rail**, include routes that overlap several project reaches. In addition, both Union Pacific and **BNSF** maintain both **active rail lines and storage tracks** along both sides of the River.

***Railroads will not be adversely impacted with required mitigations that will be required of the Project or the Project would be abandoned perhaps after a few year of litigation. Federal jurisdiction of the railroads will require that the City agree to all measures presented by the railroads and pay appropriately for such measures and railroad overheads.***

***Current high-speed rail alignments would not involve the Project area or rights-of-way as the its trackwork may go underground from the east of Reach 5 to near Main/Alameda, fr west of Reach 8.***

***BNSF is not involved in tracks within the Project area.***

***This is the first and only mention of "storage tracks" in the entire IFS and are largely restricted to Reaches 6, 7, and 8; although these tracks will require additional trestles, this sole mention appears an error.***

72

5-122/3 **Public Health and Safety, Including Hazardous, Toxic or Radiological Waste** The study area for public health and safety includes the River channel, and the immediate vicinity...Implementation of River restoration measures could result in **less-than-significant potential cumulative impacts**..., **HTRW**, **methane zones**, and...associated with the project.

***The IFS/EIS do not provide adequate and complete information regarding the presence of contaminated soils, movement of contaminated groundwater plumes, and ground methane within and adjacent to the Project area. Without such information, no analyses nor assessment can be considered adequate, complete, or reliable, and no claim of "less than significant" or "potential cumulative impacts" can made supported.***

73

6-36/6 **Alternative 16 (AND)** Impacts...include those identified under Alternatives 10 and 13...more extensive compared to Alternative 10 due to more extensive implementation of proposed restoration measures...Short-term, significant impacts to transportation and circulation would occur as a result of having to **temporarily close railroad lines** that **pass through Piggyback Yard** to allow them to be placed onto trestles...passenger and freight trains to be rerouted during the construction phase, leading to delays in rail service and disruption of delivery schedules.

***As mentioned before, railroads will be fully compensated by the Project Sponsor for all impacts plus overheads, and other financial packages before any activities occur.***

***Mainline railroads pass along the north, west, and south boundaries of the Piggyback Yard but do not enter the Yard, strictly speaking,***

74

75



***only storage tracks lie within the Yard and if trestle would cover most of the area. Since the railroad Yard activities require wheeled access for transfer the proposed Project will be required relocate and compensate for any and all disruptions for the entire Yard, perhaps to Colton or Palmdale. Therefore any alternative requiring access to the Yard will require relocation of the entire yard but retaining trestled railroad tracks along the north, west, and south perimeter of the Yard.***

75

6-31/1 **6.4.3 HTRW** ...known contaminated sites within the study area that cannot be avoided by the project...San Fernando Valley Superfund Site, and Taylor Yard G1 and G2...high impact sites. In addition, contamination is **possible** at the Piggyback Yard site based on **historical uses, posing a potentially high impact to the project** since the **extent of this potential contamination is unknown**. Localized groundwater contamination may also be encountered during construction...non-Federal sponsor [=LA City] would remediate or ensure the remediation of soil contamination to the standard required for the restoration project prior to construction of restoration features at the affected sites. Because it is **infeasible to remediate groundwater contamination prior to construction**, the sponsor would be responsible at **100 percent non-project cost for addressing contaminated groundwater**...

76

***The entire Piggyback Yard must be considered contaminated as it was operating at least in 1909 and well before the Taylor Yard, 1915-1925 and included many of the same activities. In addition, numerous gas plants along the railroads received coal as feedstock for their typical coal gasification activities which also produced large amounts of hydrocarbon contaminants and products used by the railroads. The IFS/EIS is totally inadequate and incomplete and erroneous in their discussions of the history of the Piggyback and Taylor Yards and therefore the risks of contaminated soils and underlying groundwater.***

6-31/1 The sponsor understands its responsibility and has **directly committed** to undertaking or ensuring the **necessary HTRW remediation**...including providing sites to be cleaned to be compatible with the restoration land use necessary and **addressing** groundwater contamination during dewatering activities.

***The IFS/EIS provides no references or documentation in support of these statements. As the IFS/EIS do not provide any integration with existing contaminated groundwater studies in the SFB or with railroad programs and greatly understate the risks of contaminated soils and groundwater in Reach 5-8, the commenters cannot and the Public should not accept vague statements.***

77

**APPENDIX A Design**

Appendix A p.50/2 A concrete reinforced **naturalized** channel...constructed on the **left/east and right/west banks**...and extend 50 feet towards the center of the channel.

p. A-50/2 **Naturalized** channel locations...excavated at a depth of 12 feet and width of 50 feet towards the channel centerline...behind the locations of the proposed retaining walls and...allow temporary access for construction of the retaining walls.

**No concrete planter boxes, concreted rubble-filled trenches, and trestled concrete channels can be considered to be "naturalized", transformation to natural state or conditions, especially as the channel would retain more than 100ft, half the width of existing channels.**

78

**This and similar wordings appear to be reflecting a bias approach for exaggerating the restoration and minimizing the remaining artificial nature of the flood channel.**

**Similarly, such statements and avoidance elsewhere that the channel does not provide the standard 1%/100-year recurrence protection afforded by such channel elsewhere casts suspicions that the entire document is inadequate and incomplete and does not provide the Public with a full disclosure document.**

**In addition, the IFS/EIS does not indicate, here and elsewhere, that the sidewall reconstructions will be close to the existing groundwater table surface and that as elsewhere in Reaches 7 and 8 and perhaps Reach 6 such proximity exposes workers and air quality to hydrogen sulfide gases emanating from the oil-field contaminated groundwater known to be in the area and discharging to the channel through flapped weepholes in the channel bottom.**

79

A-p.51/ **Figure 4.16 Cross-Section 7, Interstate 6 [sic, I-5] to Main Street**

80

**A-p.52/2 Preliminary Channel Design...**"Arroyo Seco Cross-Section,"...design...remove 4 feet and 24 feet off the top of the **existing left/south** and **right/north [channel passing from east to west]** retaining walls...; the **left/south bank** would be widened...**the right/north bank** widened...

A-p.54/2 **Preliminary Channel Design...**"Cornfields Cross-Section,"...design...create...wide channel...**[west to east/LA River]** The **left/north and right/south banks** of the channel...**[Looking downstream which is opposite of that used for the LA River]**

81

A-p.58/ **Figure 4.19 Cross-Section 8a, Main to First Street, bottom C-Section Single-Track/Left-Side Trestle shown but mentioned p.56/2** "...existing **railroad [singular?]** would be impacted; the **railroad** would need to be elevated on **a trestle** above the proposed wetland area **[or channels]**. Construction of the trestle would avoid realignment of the current railway...

A-p.59-60 and p.61/**Figure 4.20 Cross-Section 8b, Main to First Street**  
***A single set of references should be used - e.g., north, south, east, and west should be used throughout the IFS/EIS without the more complicating terminology of left/right banks which are not in common use by the Public, the target reviewers of the IFS/EIS.***

81

***Trestles when mentioned and depicted are shown as single track and assumed to be only on left-side rather than two sets on both sides. No description is provided of a full "Typical Trestle" with dual track sets and maintenance walkways has been provided anywhere in the IFS.***

82

***No provision is made for the various junctions, spur tracks, sidings, and the Piggyback Yard with many yard tracks. No provision is made for container loading/unloading in Yards.***

***No mention and depiction is made of dual-plus track sets on both side of channel and extent of trestle along the channel and adjacent to fences.***

83

***The IFS/EIS are inadequate and incomplete with regard to all trestle works, their designs, and thereby their costing and degree of mitigation.***

A-p.67/5 - Alt 13. Existing railroad tracks within the Piggyback Yard parcel would be elevated on trestles to allow flow through and connection of the riparian zone and marsh habitat to the main channel.

A-69/5 Alternative 16 ...channel would be constructed through the Piggyback Yard,...Existing railroad tracks within the Piggyback Yard parcel would be elevated on trestles to allow...connectivity to the riparian zone, channel, and marsh habitats [***beneath the trestles***].

***More than 12 sets of tracks x 2500ft occupy the Piggyback Yard renders this option impractical if not impossible.***

84

***Tracks-On-Trestle does not replace the function of container transfers to/from stacks/trucks <> rail cars.***

***Project and sponsor cannot practically place all operations on trestles therefore the yard would cease to existing and all functional facilities would require relocation to other areas.***

***None of this has been documented in agreements of the City or County with the railroads.***

***None of the impacts of indirect relocated functions, operations, and facilities has been assessed.***

A-70/1 Elevate railroad (Reaches 7,8)

***Reach 7 1000+ feet >4,000ft***

***SR-110 3 right 2 left***

***SR-110-Broadway-Cardinal 2-5 right 2 left***

***Reach 8 2000ft >8000ft***

***Cardinal - Chavez 2-5 right 2-6 left***

***Chavez - First 2-4 right 2 left***

***All Union Pacific, Metrolink, AmTrak, and MTA/LOSSAN***

***20+ Yard Rail Sidings***

85

**Total trestling of the channel openings require a doubling or more of the lineal measurements and thereby the costs, which also excluded railroad standards, transfer of rail/new rail, overheads, and acceptance, without claims.**

86

**The measurement and unit costs bases are in error but would probably not be done by Sponsor contractors anyway. Railroads would have full control of all related activities and would charge accordingly.**

A-71/4 **Reach 7** – Storm drain outlets...to create **freshwater marsh habitat** on the overbank area of the channel, and include **one [large] storm drain on the left bank**, and **two [large] storm drains on the right bank**...rebuilt in this reach to provide habitat features and flow regimes supportive of **in-stream biota**. **Existing railroad tracks on the right bank** would be **elevated on trestles** to allow flow through and main channel hydrologic connection to the riparian zone, channel, and marsh habitats.

87

**Construction of freshwater marsh must have perennial water sources other than high groundwater tables. IFS/EIS does not document the flows and persistence of flows for these drains.**

**Statements increase the trestling of the bank on the east side of the channel without trestles being reflected in measurements and costs.**

88

**Trestling is not required on the east side without basis for selecting east or west for trestles.**

**Other smaller drains exist on both sides; no criteria are provided to select the drains to be "naturalized".**

89

**Unclear meaning as to "in-stream biota", sedges or snails or fish?**

A-71/8 **Reach 8** The main channel...reconfigured to take advantage of the Piggyback Yard parcel...1,000-foot-wide bench...would include marsh vegetation. A channel...through the Piggyback Yard...supportive of marsh habitat. Existing railroad tracks **within** the Piggyback Yard parcel would be elevated on trestles to allow flow through and main channel hydrologic connectivity to the **riparian zone**, channel, and marsh habitats.

90

**Statement suggests a few tracks rather than 20+ Yard Rail Sidings of 1000-2500ft in the Yard and the need for full relocation of the entire Yard rather than 40,000ft of trestles. Trestled siding track could not function without yard equipment and supports for cranes, gantries, lifts, trucks, etc. and 3.5M sq ft of trestles.**

91

**Continuing and persistent underestimating of the effects in the Piggyback Yard renders all aspects for Alternatives 13-20 in the IFS/EIS totally inadequate and incomplete and in error for design and costing.**

## Appendix C Costs

**C - 3-13/Reach 7** Line 1 Lengths 1000ft x \$5000

**C - 3-15/Reach 8** Line 1 Lengths 4806ft x \$5000

**C - 3-18/ Unit Costs/All Reaches** Line 35 Railroad Trestle LF \$5000...Engineers estimate for placing an elevated railroad trestle

**Piggyback Yard 20+ Yard Rail Sidings of 1000-2500ft**

**90-100+ acres = 3.5M sqft 1000+x3500ft - 3000+ft E-W x 2200+ft N-S, or 2600ft NW-SE x3400ft NE-SW**

**Statement suggests a few tracks rather than 20+ Yard Rail Sidings of 1000-2500ft in the Yard and the need for full relocation of the entire Yard rather than 40,000ft of trestles. Trestled siding track could not function without yard equipment and supports for cranes, gantries, lifts, trucks, etc. and 3.5M sq ft of trestles.**

**Continuing and persistent underestimating of the effects in the Piggyback Yard renders all aspects for Alternatives 13-20 in the IFS/EIS totally inadequate and incomplete and in errors for design and costing.**

92

**C - 4-1 O&M Line 35** 0% No O&M Costs Anticipated

**C-7/3 Line PS-12** No design currently for the storm drains or the new railroad trestles. Scope for these...not anticipated to grow, but if it did costs would increase significantly.

**C-7/5 CE-12** High risk or complex construction elements, site access, in-water, unique construction methods, Special equipment or subcontractors needed,

Construction of the railroad trestles is a more difficult construction task. The railroad companies would need to be heavily involved and special contractor would be likely. Cost estimate assumed a sub- for this work, and has conservative unit cost. Therefore impact would be marginal, but risk is still high of something not going as planned.

**As the trestles will form part of the relocation package for all railroads, Zero O&M for trestle cannot be justified, especially since the existing rights-of-way have virtually zero costs and high accessibility while trestle in water require maintenance without similar accessibility.**

**The assumed ZERO-O&M reflects a totally inadequate and incomplete approach to the entire railroad relocation activities and total absence of experience with national Main Line railroads.**

**Without a clear MOU/MOA with the relevant railroads, risks for increased costs and very significant increases are assured and 100% realizable.**

**Furthermore the construction of the trestle is different from track relocation or installation of new track (anticipated).**

**Most likely, railroads would assume all control of any works for their rails, with full and complete payment by the appropriate Project participants.**

**Project participants shall be required to fully compensate the railroads for any operations delays or disruptions of mainline and yard railroads.**

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**APPENDIX K HTRW SURVEY REPORT**

***This entire section is totally incomplete and inadequate with regard to the known presence and migration of the SFB contamination plumes into the northern Reaches 1-3 and those beneath the Taylor Yard and Reaches 4-6. For Reaches 7-8, the preparers appear totally unaware of extensive contaminated groundwater and hazardous soil contamination from railroad, lumber, and coal gasification facilities dating back to 1870s throughout Reaches 7-8, north of US-101. Hydrogen sulfides in the groundwater from Broadway to US-101 and from Alameda to the River reached levels of >100mg/L during RTD/MTA construction of the Red Line facilities.***

95

***Similarly, the preparers are unaware of the numerous shallow oil fields beneath Reaches 7-8 and extensions of productive formations beneath Reaches 5-6, and of the DPW encounters with H2S and methane during sewer excavations.***

**K-13/2** The Piggyback Yard site is a REC because of additional information obtained from the 1953 historical USGS topographic map of Los Angeles, which shows this property and Taylor Yard under use for **similar purposes in the mid-20th century.**

**K-16/4** Piggyback Yard is...non-mapped HTRW REC property that impacts the restoration project, because the extent and presence or existence of HTRW is unknown...has **historic similarity with Taylor Yard,**...

***In a one-hour internet search, the Piggyback Yard was clearly depicted in 1909, although nothing was depicted in the Taylor Yard area. A more professional search of archives and historic aerial photos may provide far more adequate and complete The supporting documents and EIS text are totally wrong in the historic context of Taylor Yard compared to the larger, earlier, and probably dirtier contamination of soils and underlying groundwater.***

96

***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

**K-13/4** The **AAI search and results for this report** indicate **no HTRW concerns for the Piggyback property.** That is, **no records were found** of any active or open environmental regulatory CERCLA **related HTRW concerns** or files or actions associated with this property...information **found for this property** listed only a few minor reported regulatory actions...spills of hazardous materials from within railcars unloaded at this property. The spills were remedied to the satisfaction of the local California environmental regulatory authorities and no further regulatory action was required...much of the existing surface at this property is asphalt

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paved...there are no maintenance facilities or related buildings on this property, nor are there any activities that involve the use, treatment or storage of large amounts of hazardous materials.

***Such a mechanical search indicates the lack of judgment and experience on the part of the preparer not the records. Historic records do exist and are well known for coal gasification plants as shown by chimneys in the 1909 depiction and 1920-30's aerial photos that showed the sites in Reach 8 and probably Reach 7 and maybe Reach 6.***

***LACity and LACounty maps and records also show the owners and uses and sometime building measurement from which reasonable interpretations maybe made regarding the potential/risk of contamination from coal gasification plants (many coal-tar hydrocarbons and PAHs), oil/lubricant/brake fluids depots (PCB, hydrocarbons, etc.), timber tie yards (creosotes, PCPs, etc), and steam generation (asbestos and mercury). The search conduct is obviously flawed and limited so as to purposefully underestimate the probabilities and risks of high and locally assigned unfundable costs for remediation.***

***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

K-13/5 However, some concerns still remain regarding HTRW for the Piggyback property that has been noted by the project Sponsor (City of Los Angeles). Much of the additional information regarding such concerns for this property was obtained during discussions that occurred during the follow up AFB meetings. The most important information was obtained during a recent search of the USGS historic topographic map collection. This search revealed the presence of a railroad maintenance yard shown on the historical 1953 topographic map...This cluster of buildings is also labeled on the map as "Union Pacific Maintenance Yard"...The map reveals evidence that both maintenance yards were **active on or about 1953**. Further review of historic topographic maps **after 1953**...This indicates that the maintenance yard did not exist sometime after 1953.

K-14/1 ...recent findings from the historic USGS 1953 map...HTRW is still present at Taylor Yard, **it is possible that HTRW may still exist at Piggyback Yard**...historical maintenance activities at Taylor Yard contributed to the majority of its present HTRW contamination. Because Piggyback Yard and Taylor Yard **were in use at the same time**, similar activities **most likely occurred** at both of these properties...**historical similarities**...Piggyback Yard is likely to contain **some amount** of HTRW contamination and is therefore carried forward as a REC.

***Refer to pictures of 1894, 1906, 1908, and 1909 Illustrated Map***

***<http://www.bigmapblog.com/tag/los-angeles/>***

***Pierce's Los Angeles Birdseye View (1894); no railroad yard is shown Map of Los Angeles railway systems (1906)***

***Security Savings Bank Map of Los Angeles (1908); no indication of yard, but main line tracks shown***  
***Birdseye View Pub. Co.'s Birdseye Map of Los Angeles (1909); full Piggyback Yard development shows yard and half-roundhouse and many others yard tracks but nothing is shown for Taylor Yard.***  
***Piggyback Yard is more likely to have more contamination than at Taylor as it preceded Taylor by more than ten years and has adjacent coal gasification plants which received coal from rail siding and provided hydrocarbon products for the rail operations and construction (creosote for all timber products) activities.***  
***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

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K-14/4 Piggyback Yard is one additional non-listed and non-mapped HTRW REC property that impacts the restoration project, because the extent and presence or existence of HTRW is unknown...has **historic similarity with Taylor Yard**, which is presently contaminated with HTRW...

***As the Piggyback Yard preceded Taylor Yard and had similar but additional industrial process nearby and larger cooling ponds, we must assume that the now-covered soil is thoroughly contaminated and contamination has reached the high groundwater table in the area.***

***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

**K-16/1** The Sponsor ***[LA City]*** is responsible for 100% costs for the response of any HTRW contamination for these **two properties** such that it meets the future land use requirements for this LAR project. **The Sponsor has committed to undertaking necessary remediation and providing "clean sites" prior to construction of the LAR restoration project.**

These costs would not be cost shared as part of the restoration project.

***LACity shall be responsible for the two properties and all track relocations and underlying contaminated soil removal and treatment for both west/right and east/left mainline rail tracks to trestles.***

***The cost estimates are totally erroneous and based on no facts in evidence. The entire approach especially to the Piggyback Yard is to downplay contamination and assume cleanliness rather than estimating: 400K sq yd x 5 yd deep = 2M cu yds of contaminated soil x \$600/cuyd = \$1.2B which the City would have to pay before any Project work would commence.***

***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

98

99

**K-16/1** It is likely that this response will consist primarily of excavation-removal/hauling efforts directed towards remediation of soil and soil vapors. This is the most direct and effectively remediation method... There are other remediation methods...are not suitable for the short time frame needed to construct the habitat.

**No MOU/MOA has been provided therefore no probabilities can be assessed, as the relevant railroad would be expected to take charge of any work within their areas and rights of way.**

**The entire approach especially to the Piggyback Yard is to downplay contamination and assume cleanliness rather than estimating: 400K sq yd x 5 yd deep = 2M cu yds of contaminated soil x \$600/cuyd = \$1.2B which the City would have to pay before any Project work would commence.**

**This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.**

100

**K-18/1 6.0 GROUNDWATER CONDITIONS 6.1 Summary of Groundwater Conditions and Related Discussion** The groundwater exists in the form of an unconfined aquifer throughout most of the project study area...contains both shallow and deep groundwater portions that differ in general quality...shallow portion...to approximately 100 feet below ground surface, while the deeper part extends from 100 feet below ground surface to approximately 200 feet....co-mingled and widely contaminated with known HTRW...VOCs and Chromium metals...officially known as the SFVSS, a Federal CERCLA Superfund site.

**The statement that the groundwater resources are both unconfined but separable into two components appear to contradict each other. Furthermore, no mention is made for 1994 and later updates of the SFBGroundwater Model which extends to at least SR-2 bridges within the Project area.**

**This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for groundwater contamination and remediation for Reaches 1-5 if not further.**

101

**K-18/2** Groundwater contamination, unlike soil contamination, cannot be effectively addressed prior to construction in order to provide complete remediation at groundwater contaminated areas/properties...would be the responsibility of the Sponsor at 100% non project cost.

**Groundwater is commonly contained and remediated and depending on the construction schedule additional wells and pump/treat systems could be employed.**

**This entire section reflects the practicality of incorporating the costs of complete remediation to say <10ppm TPH.**

**The sections dealing with groundwater, surface water, soil contamination, and groundwater contamination are totally incomplete and inadequate with apparent bias for promoting the**

102

***Project without consideration of risks and costs for the Project and especially for Alternative 13-20.***

**K-18/4** Open bottom areas and weep and drain holes exist within the LAR channel/levee...built into the channel/levee for...relieving and draining this structure of surrounding...ground water...provided a continuous and open pathway for discharge of groundwater, including any uncaptured HTRW contaminated groundwater from the SFVSS that might or might have already migrated into the LAR.

***Those downstream of SR-110 have provided discharge for high contamination levels of H2S arising from beneath the west side floodplain of Reach 8 and perhaps other locations in Reaches 6-8. Simple inspection of the channel floor discharge ports will show white deposit of CaSO4, sulphate where the H2S reaches aerated water.***

***Such "sour water" would adversely impact any open excavations near the groundwater table and any dewatering discharges as was the case with the Red Line Phase One excavations in Reach 8 The sections dealing with groundwater, surface water, soil contamination, and groundwater contamination are totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for the Project and especially for Alternative 13-20.***

103

**K-18/5** ...very likely that some portions of the edge of the SFVSS HTRW contaminated groundwater plume are or have already discharged into the river on a continual basis... 19/1 of certain project features such as wetland and open bottom areas should not interfere or promote migration of this plume since some of it is or has already migrated into the LAR. The construction of unique habitat features should not interfere with or alter the existing pathways of migration of contaminated groundwater beneath the Study area.

***The discharge to the river can be viewed separately from the continued southward migration from the SFB into the Narrows and eventual discharge to Reaches 6-8. As recognized elsewhere the two-part groundwater table contamination has not been monitored and migrating contaminant plumes have not been fully documented along with groundwater regimes.***

***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

104

**K-19/1** ...certain project features such as wetland and open bottom areas should not interfere or promote migration of this plume since some of it is or has already migrated into the LAR...construction of unique habitat features should not interfere with or alter the existing pathways of migration of contaminated groundwater beneath the Study area.

105



**K-19/2** Wetlands are **known to naturally degrade HTRW contaminants**,...presence of this particular feature and the combinations of active responses should further reduce migration of HTRW contamination plumes into the LAR after the project is built.

**K-19/3 Planned irrigation**...could result in leaching **contaminants** to the underlying shallow groundwater system...potential adverse impacts to the existing groundwater system associated with the infiltration...minimized by limiting irrigation and surface runoff...minimize infiltration and leaching of soil contaminants...threat to the underlying shallow groundwater system...eliminated by the **complete removal** of contaminated soils beneath areas that will experience irrigation, surface runoff and erosion.

**K-20/2** The REC for the **one** Piggyback Yard property exists based on the **historical similarities** between this property and the Taylor Yard property, which is currently a high impact HTRW site with existing known amounts of heavy HTRW contamination. The presence and extent of the HTRW contamination at Piggyback Yard is unknown at this time because it has **never had cause to or has never before been formally investigated**...full impact of HTRW at this site on this project will continue to remain unknown until such time a formal investigation is undertaken.

***No analysis or modeling has been conducted for the IFS/EIS, therefore none of this can be justified or documented. Without a good groundwater model, effects of surface water recharging of groundwater and groundwater discharging to surface water cannot be assessed or analyzed.***

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#### **K-19/5 7.1 Extent of HTRW impacts**

This appendix identifies 23 properties that are impacted by HTRW and contamination within 500 feet of the project footprint. Three of these properties are of high HTRW impact to the project. Nineteen are low impact. **One is of unknown impact [Piggyback]** but has historic use characteristics similar to high impact sites.

**K-20/2** The REC for the **one** Piggyback Yard property exists based on the **historical similarities** between this property and the Taylor Yard property, which is currently a high impact HTRW site with existing known amounts of heavy HTRW contamination. The presence and extent of the HTRW contamination at Piggyback Yard is unknown at this time because it has **never had cause to or has never before been formally investigated**...full impact of HTRW at this site on this project will continue to remain unknown until such time a formal investigation is undertaken.

**K-20/2** Any **HTRW impacts for Piggyback Yard are assumed to be the same as that existing for Taylor Yard at this time.**

Further...investigations and studies...will need be undertaken before the impacts are ascertained fully.

**K-20/3** The extent of the undefined portions of the known residual groundwater and/or soils contamination at **all 23 properties** is not known at this time...There is a possibility that future activities related to construction and maintenance of the habitat project will encounter portions of both **known or undefined** but known residual groundwater and/or soils

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**contamination**...water discharge from these activities will need to be approved and permitted prior to release according to the Los Angeles RWQCB water quality standards...This is a Recognized Environmental Condition...and is in turn a HTRW impact to the Corps of Engineers Los Angeles River Ecosystem Restoration project study area.

106

***This entire section like other references do not reflect responses to comments previously given for the historic relationship of the Piggyback and Taylor Yards is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

**K-21/5** There is insufficient information from the search/inquiry to determine the **true extent or level** of contamination, or severity of the HTRW impact...recommended actions...more rigorous review of...environmental reports or data case files...visiting and obtaining the files from the LARWQCB and DTSC for the listed REC sites....also likely involve more intense discussions with regulatory agency personnel or scientists about the severity of the HTRW contamination...site visit...to gain a clearer understanding of the nearby topography and features of each site.

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***This entire section is totally incomplete and inadequate with apparent bias for promoting the Project without consideration of risks and costs for Alternative 13-20.***

***This hasn't been done - totally inadequate setting and impacts assessment and assignment of costs and liabilities.***

**From:** [Craig Collins](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Silver Lake Reservoirs Conservancy position on ARBOR study.  
**Date:** Friday, November 15, 2013 9:03:04 PM

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## **SILVER LAKE RESERVOIRS CONSERVANCY STATEMENT ON USACE LOS ANGELES RIVER ARBOR STUDY.**

Silver Lake Reservoirs Conservancy applauds the completion of the ARBOR study and its conclusions that substantial restoration efforts of the Los Angeles River are needed and worthy of public investment.

Alternative 20 is the clear correct choice, because it's the only one that can achieve the benefits the entire ARBOR study contemplates. Silver Lake Reservoirs are close by the River and offer potential to aid key River restoration objectives, including:

- Stormwater management,
- Riparian viability, and
- Reduced need for costly imported water in the Los Angeles region.

As the Reservoirs are to be removed from the LA domestic water system, their future will be closely related to the future of the LA River. It is important that the Alternative selected for restoration be sufficient to achieve these objectives.

Moreover, as shown by many other cities that have seen US Army Corps of Engineers and other waterway restoration programs, returning rivers to their cities as life-giving bodies serves as a lever to spur restoration of the urban core. Result: revitalized neighborhoods, economic resurgence and a better quality of life.

The lesson learned by these cities is clear: **these restorations pay for themselves in the transformation of their cities.**

Only Alternative 20 provides the comprehensive revitalization sufficient to create the leverage needed to build true transformation of the LA River. Alternative 13, while offering important benefits, will not have the results that can sustain the essential purpose of the effort. Half-measures return less than half benefit.

Alternative 20's initial investment will be returned with interest, as long-neglected communities along the River enjoy its benefits and create new places to work, live and play.

The Los Angeles River is the vital spine of Los Angeles, as it has been for over two hundred years. Restoring its life will not only bring a viable ecosystem back to its waters, but will spur the revitalization of neighborhoods far beyond its banks. This is what we have learned from other cities in the US, China, Korea, Spain, Germany, and many others. It is time for Los Angeles to discover what it can create with its River.

**Craig Collins**  
President  
[craig.collins@silverlakereservoirs.org](mailto:craig.collins@silverlakereservoirs.org)

[www.SilverLakeReservoirs.org](http://www.SilverLakeReservoirs.org)  
**Silver Lake Reservoirs Conservancy**  
P.O. Box 39735, Los Angeles CA 90039

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October 18, 2013

Josephine R. Axt, PhD, Chief, Planning Division  
US Army Corps of Engineers, Los Angeles District  
PO Box 532711  
Los Angeles, CA 90053-2325

Attention: Ms. Erin Jones CESPL\_PD\_RN

Dear Ms. Axt and Ms. Jones,

At its regular board meeting on October 16, 2013, the Board of the Studio City Neighborhood Council passed the following motion:

**MOTION 10.16.2013.SP5: The Board of the Studio City Neighborhood Council supports the selection of Alternative 20 as it is described in the Los Angeles River Ecosystem Restoration Integrated Feasibility Study rather than Alternative 13 which was tentatively selected by the U.S. Army Corps of Engineers.**

If you have any questions, please do not hesitate to contact us.

Sincerely Yours,

*Lisa Sarkin*

Lisa Sarkin, Vice President  
Studio City Neighborhood Council

Cc: Los Angeles City Councilmembers, Matt Hale, Karo Torossian

LS/ls

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P.O. Box 1374 • Studio City, CA 91614 • Ph (818)509-0230 Fax (818)509-0260 • [www.studiocityresidents.org](http://www.studiocityresidents.org)

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers- Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Dr. Axt:

We strongly support, as do elected officials at many levels of government, that the best long term solution would be to adopt Alternate 20 for the restoration of the LA River and the LA River Watershed.

Alternate 20 removes more concrete which will lead towards creating habitat, restoring wetlands that will encourage the return of wild life and just as important, provide access for the public to the river, a sorely needed requirement for the citizens of Los Angeles and the San Fernando Valley.

The highly degraded Los Angeles Watershed must be restored not only for the above obvious reasons but also for the unforeseen benefits to future generations to come: Alternate 20 is best suited to these objectives.

The scope of restoration within Alternate 20 will not come around again: if the opportunity to go with Alternate 20 is not recommended and adopted by the Corps, it will be too late to say "I wish we had done otherwise than go with Alternative 13."

Please listen to all those who support Alternate 20.

Sincerely,



Alan Dymond  
President  
Save LA River Open Space  
[saveopenspace@slaros.org](mailto:saveopenspace@slaros.org)  
[www.savelariveropenspace.org](http://www.savelariveropenspace.org)  
818-509-0230





The City Project \* Anahuak Youth Sports Association \* Asian and Pacific Islander Obesity Prevention Alliance  
 Asian Pacific Policy & Planning Council \* Robert Bracamontes \* Marc Brenman  
 California League of United Latin American Citizens \* Chatten-Brown & Carstens LLP \* Center on Race, Poverty & the Environment  
 COFEM (Consejo de Federaciones Mexicanas en Norteamérica) \* Concerned Citizens of South Central Los Angeles  
 Belinda Faustinos \* Friends of the River \* Senator Tom Hayden (Ret.) \* Latino Coalition for a Healthy California  
 Los Angeles Business Council \* Los Angeles Neighborhood Land Trust \* Los Jardines Institute (The Gardens Institute)  
 Multicultural Communities for Mobility \* Mujeres de la Tierra \* National Parks Conservation Association  
 Natural Resources Defense Council \* Prevention Institute \* Search to Involve Pilipino Americans \* Sierra Club  
 SPARC (Social and Public Art Resource Center) \* Amigos de los Rios \* Mia Lehrer + Assoc.

November 18, 2013 Updated

Josephine R. Axt, Ph.D.  
 Chief, Planning Division  
 U.S. Army Corps of Engineers  
 Los Angeles District  
 P.O. Box 532711  
 Los Angeles, CA 90053-2325  
 ATTN: Ms. Erin Jones, CESPL-PD-RN  
 Via e-mail comments.lariverstudy@usace.army.mil

**Re: Support Alternative 20 for Green Justice along the Los Angeles River, including Health and Environmental Justice, Parks, and Recreation -- Public Comments on Draft Los Angeles River Ecosystem Restoration Feasibility Study**

Dear Dr. Axt:

## I. Overview

The Army Corps of Engineers channelized the Los Angeles River in concrete in the 1930s to prevent floods. The people of Los Angeles now have the opportunity to work with the Corps, the National Park Service, Department of Interior, U.S. Environmental Protection Agency (EPA), and state and local government to restore the lost beauty of the River with equal justice for all. The Mayor of Los Angeles, the Los Angeles City Council, the Los Angeles Business Council, diverse nonprofit organizations, and community stakeholders all **support Alternative 20, which is the best alternative to help ensure healthy, livable communities for all along the Los Angeles River.**

**The Corps must consider the impact of River restoration on all communities, including communities of color and low-income communities, to ensure the benefits and burdens are distributed fairly. The Corps must analyze fully green access, health justice, active living, culture, art, and history, affordable housing, complete green streets, local green jobs, and impacts on people, as well as environmental impacts.**

The dual purposes of the draft Los Angeles River Ecosystem Restoration Feasibility Study ("Study") are

*Equal Justice, Democracy, and Livability for All*

Board: Chris Burrows Juan Devis Robert García Tom Hayden  
 Robbie LaBelle Lyndon Parker Michael Rodriguez

The City Project is a 501(c)(3) Non-Profit Organization and a Project of Community Partners

Dr. Josephine R. Axt, Chief, Planning Division, U.S. Army Corps of Engineers

**Support Alternative 20 for Green Justice along the Los Angeles River**

November 18, 2013

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“to restore approximately 11 miles of the Los Angeles River from Griffith Park to downtown Los Angeles” and “to provide recreational opportunities consistent with the restored ecosystem within this 11-mile reach of the river.”

Alternative 20, called RIVER (for Riparian Integration via Varied Ecological Reintroduction), is the most comprehensive restoration alternative analyzed by the Study. Alternative 20 provides for an investment of \$1.04 billion in the future and children of Los Angeles. Alternative 20 includes all the features of the other Alternatives. This includes restored habitat and wetlands at Piggyback Yard, widening at Taylor Yard, restoration in the natural bed river sections of the Glendale Narrows, terracing of the River near Riverside Drive, transitions or connections between existing riverside corridors and sections of the River that are lined concrete, and terracing, widening, removal of concrete, and restoration of wetlands in the River channel itself. Alternative 20 is the only alternative that includes widening the River near the Bette Davis Park area of Griffith Park, restores the confluence of the River with Verdugo Wash, and restores wetlands at the Los Angeles Historic State Park with a terraced connection to the main stem of the river. Alternative 20 restores two times the River length that the Corps’ preferred Alternative 13 does. **We support Alternative 20.**

We applaud the Corps for analyzing environmental justice and socioeconomics (sections 3.13 and 5.13), recreation and access (sections 3.9 and 5.9), cultural resources (sections 3.6 and 5.6), and transportation (sections 3.7.6 and 5.7). The Corps recognizes with respect to environmental justice that “[o]f key concern in Los Angeles is the growing disparity of access to and use of open space resources, including parks, ball fields, and natural areas by those living in low-income communities of color.” Study, section 3.13.3. Parks and recreation are an important component of health, prevention, and wellness. The Corps includes a detailed plan for recreation (section 4.16) and public involvement (section 8).<sup>1</sup> **Alternative 20 is the best alternative to advance each of these goals.**

The Corps has an opportunity to create a best practice analysis and alternative for greening urban waterways and for community participation world wide. The Smithsonian Anacostia Community Museum’s current exhibit “Urban Waterways and Civic Engagement” emphasizes that greening urban rivers and inner cities is not just about conservation values — as important as those are — it’s about the people who live along the rivers, and the future of our children and our world. The exhibit covers the L.A. River and five others around the world.<sup>2</sup> The *New York Times* highlights revitalization of the L.A. River as a best practice example for “more sustainable, livable and socially just cities.” Nicolai Ouroussoff, *Reinventing America’s Cities: The Time Is Now*, N.Y. TIMES, (March 29, 2009).

The Los Angeles River stretches 52 miles and crosses over a dozen cities, flowing through diverse communities from the headwaters in Calabasas in the Santa Monica Mountains through the San Fernando Valley and downtown Los Angeles to the ocean in Long Beach. The River, which should be naturally green, is not. Children of color living in poverty with no access to a car have the worst access to parks and green space, suffer disproportionately from chronic health conditions including obesity and diabetes, and are the most at risk for crime, drugs, and violence, in the region.

We applaud the federal government for making the revitalization of the Los Angeles River a national priority. The determination that the Los Angeles River constitutes “traditionally navigable waters” by EPA Administrator Lisa Jackson cleared the way for this federal leadership. President Barack Obama’s

<sup>1</sup> Relevant Study excerpts are included as Appendix A.

<sup>2</sup> Smithsonian Anacostia Community Museum, *Reclaiming the Edge: Urban Waterways and Civic Engagement* (Oct. 15, 2012 – Nov. 3, 2013), [http://anacostia.si.edu/exhibits/current\\_exhibitions.htm](http://anacostia.si.edu/exhibits/current_exhibitions.htm).

Dr. Josephine R. Axt, Chief, Planning Division, U.S. Army Corps of Engineers

## **Support Alternative 20 for Green Justice along the Los Angeles River**

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America's Great Outdoors initiative designates the greening of the Los Angeles and San Gabriel Rivers as one of the nation's top 101 outdoor priorities. The Urban Waters initiative includes the Los Angeles River as one of the nation's top ten priorities. The National Park Service has published multiple studies on green access, human health, disparities based on race, color, national origin, or income, and the responsibility of park agencies to alleviate those disparities.

River restoration should serve diverse needs and the full range of values at stake through democratic participation in the planning process and a fully funded, balanced Alternative 20 that includes:

- multibenefit park and green space projects that promote healthy active living; clean water, land, and air; urban habitat; and climate justice
- biking, running, hiking, camping, and passive recreation
- active recreation, including soccer, baseball, and other sports fields
- public health values incorporated into River and urban planning
- complete green streets with bike trails and safe routes to school
- joint use of parks, schools and pools along the River
- economic vitality and local green jobs
- affordable housing to avoid displacement and gentrification
- protecting Native American and spiritual values
- public art celebrating the diverse heritage and culture of Los Angeles, and
- Transit to Trails to take urban residents on fun, educational, and healthy River, mountain, and beach trips.

2

Alternative 20 is the best alternative for all the people of Los Angeles and beyond to have equal access to green space and places for healthy recreation, including park poor, income poor communities and people of color.

We look forward to working with the Army Corps of Engineers to seek equal justice, democracy, and livability for all along the River through Alternative 20. Part II discusses the people along the River. Part III presents equal justice laws and principles, including the requirements to conduct a compliance or equity analysis and a health impact assessment for River revitalization. Part IV discusses the values at stake – park and health values; economic values and local green jobs; transportation justice; Native American and spiritual values; culture, history, and public art; and best practices for clean water justice. Part IV concludes with the implications for the Study and Alternative 20.

1

## **II. Alternative 20 Best Serves the Needs of People along the River**

Projects should be prioritized for the people in the areas with the greatest need. These areas are shown in red along the River in the map below. Alternative 20 best serves these needs.

Dr. Josephine R. Axt, Chief, Planning Division, U.S. Army Corps of Engineers

## Support Alternative 20 for Green Justice along the Los Angeles River

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Children of color living in poverty with no access to a car have the worst access to parks and green space, suffer disproportionately from chronic health conditions including obesity and diabetes, and are the most at risk for crime, drugs, and violence, in the region. These facts are illustrated in the map above, and in the chart below which analyzes a one-mile corridor along either side of the Los Angeles River.

### A. The One-Mile River Corridor Compared to the City of Los Angeles, County, and State

The River, which should be naturally green, is not. There are 7.2 total acres of green space per thousand residents along the one-mile River corridor, compared to 11.6 in the City of Los Angeles, 89.8 countywide and 1,343.5 statewide.

Communities along the River corridor are disproportionately Latino – 52% along the River, compared to 48% for the City of Los Angeles, 47% for the county and 37% statewide. 18% of the people along the River live in poverty, compared to 20% citywide, 16% countywide and 14% statewide. The median household income is \$45,179 along the River corridor, compared to \$47,813 citywide, \$55,476 countywide, and \$60,883 statewide.

These facts are documented in the following chart.



Dr. Josephine R. Axt, Chief, Planning Division, U.S. Army Corps of Engineers

**Support Alternative 20 for Green Justice along the Los Angeles River**

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LOS ANGELES RIVER CORRIDOR												LAR - 2010 (T)
	1 MILE		1 Mile & City of LA		1 Mile & Not City of LA		LOS ANGELES CITY		LOS ANGELES COUNTY		CALIFORNIA	
	COUNT	PERCENT	COUNT	PERCENT	COUNT	PERCENT	COUNT	PERCENT	COUNT	PERCENT	COUNT	PERCENT
Total Population	883,226	-	441,125	-	442,101	-	3,761,569	-	9,758,256	-	36,637,290	-
Children (under 18)	225,951	26%	92,203	21%	133,748	30%	897,572	24%	2,460,513	25%	9,325,329	25%
Seniors (65 and over)	84,978	10%	50,912	12%	34,066	8%	384,446	10%	1,026,041	11%	4,060,596	11%
Race / Ethnicity*												
Non-Hispanic White	254,713	29%	182,510	41%	72,203	16%	1,088,971	29%	2,772,785	28%	15,107,042	41%
Hispanic	455,937	52%	172,847	39%	283,090	64%	1,811,259	48%	4,599,258	47%	13,456,157	37%
White (Hispanic and Non-Hispanic)	477,244	54%	262,611	60%	214,633	49%	1,901,057	51%	4,961,910	51%	22,392,713	61%
African American	63,880	7%	20,595	5%	43,285	10%	366,243	10%	852,780	9%	2,246,311	6%
Native American	4,008	0%	2,232	1%	1,776	0%	18,961	1%	47,794	0%	283,628	1%
Asian Pacific Islander	93,984	11%	55,806	13%	38,178	9%	435,170	12%	1,366,882	14%	4,887,681	13%
Other Race	215,265	24%	86,146	20%	129,119	29%	930,054	25%	2,219,377	23%	5,448,609	15%
2 or more races	28,845	3%	13,735	3%	15,110	3%	110,084	3%	309,513	3%	1,378,348	4%
Income / Poverty												
Median Household Income	\$ 45,179	-	\$59,169	-	\$45,766	-	\$47,813	-	\$55,476	-	\$60,883	-
In Poverty	153,190	18%	70,053	16%	83,137	19%	720,743	20%	1,508,618	16%	4,919,945	14%
Children (under 18) in poverty	Not Available	-	Not Available	-	Not Available	-	250,369	28%	543,689	22%	1,748,267	19%
Seniors (over 65) in poverty	Not Available	-	Not Available	-	Not Available	-	51,456	13%	112,637	11%	345,214	9%
People in poverty that are Children (under 18)	Not Available	-	Not Available	-	Not Available	-	250,369	7%	543,689	6%	1,748,267	5%
People in poverty that are Seniors (over 65)	Not Available	-	Not Available	-	Not Available	-	51,456	1%	112,637	1%	345,214	1%
Rent / Own												
Own	120,223	41%	68,211	41%	52,012	41%	508,944	39%	1,552,091	48%	7,112,050	57%
Rent	172,001	59%	96,849	59%	75,152	59%	800,470	61%	1,665,798	52%	5,280,802	43%
Transportation												
No Car Access	28,337	10%	15,030	9%	13,307	10%	166,373	13%	305,743	10%	935,969	8%
Health												
% of Children out of HFZ for Body Composition*	Not Available	-	Not Available	-	Not Available	-	-	53%	-	48%	-	44%
Passed 5 of 6 Physical Fitness Exams**	Not Available	-	Not Available	-	Not Available	-	28,039	20%	77,373	22%	308,408	23%
Passed 6 of 6 Physical Fitness Exams**	Not Available	-	Not Available	-	Not Available	-	32,262	23%	99,519	28%	421,894	31%
Students Enrolled in Free and Reduced Lunch Program**	Not Available	-	Not Available	-	Not Available	-	496,201	76%	1,017,249	65%	3,465,446	57%
Parks and Open Space***												
Acres of Green Space	6,331	-	5,097	-	1,234	-	43,517	-	876,327	-	49,220,693	-
Acres of Bureau of Land Management land	11	-	0	-	11	-	0	-	12,503	-	15,169,816	-
Acres of Forest Service land	0	-	0	-	0	-	2,673	-	655,179	-	20,794,883	-
Total Acres of Green Space Per 1,000 Residents	7.2	-	11.6	-	2.8	-	11.6	-	89.8	-	1,343.5	-
Net Acres of Green Space Per 1,000 Residents	7.2	-	11.6	-	2.8	-	10.9	-	21.4	-	361.8	-

The Los Angeles River Corridor is defined as a 1-mile buffer of the Los Angeles River. Demographics are based on census blockgroups with their centroid in the buffer. The buffer intersects the following: Bell, Calabasas, Cudahy, Long Beach, Los Angeles, Maywood, Paramount, Vernon, Unincorporated Los Angeles County.

\*Race/ethnicity figures will not add up to 100% if Hispanic is included. Census ACS 2006-10 allowed respondents to mark multiple races in addition to being Hispanic/Latino.

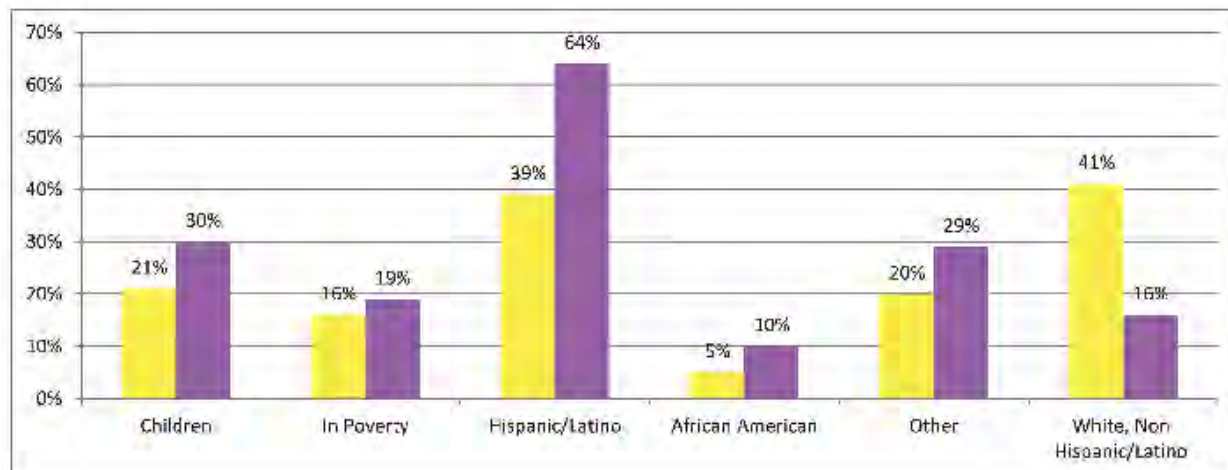
\*\*HFZ = Health Fitness Zone. Body Composition can be used as an indication of possible overweight/obesity, extracted from fitness data for grades 5, 7, and 9 from Data Quest, California Department of Education 2010-11 for LAUSD

\*\*Fitness data calculated for grades 5, 7, and 9 from Data Quest, California Department of Education 2010-11: Free/Reduced lunch: [http://data1.cde.ca.gov/dataquest/ligc\\_calworks.asp](http://data1.cde.ca.gov/dataquest/ligc_calworks.asp) for LAUSD

\*\*\* All parks and open space data has been calculated from GreenInfo Network's California Protected Areas Database (CPAD) version 1.8, July 2012 [www.calandis.org](http://www.calandis.org). Total acres include BLM and FS land. Net Acres exclude BLM and FS land.

**B. The One-Mile River Corridor within the City of Los Angeles, Compared to Outside the City**

The one-mile River corridor within the City of Los Angeles has 11.6 acres of parks per thousand residents, compared to only 2.8 acres within the corridor outside the City. The one mile River corridor within the City is disproportionately non-Hispanic white and wealthy. These facts are documented in the following bar chart and text.



Non-Hispanic whites are 41% within the City River corridor, compared to 16% outside. Latinos are 39% compared to 64%. African Americans are 5% compared to 10%. "Other race" are 20% compared to 29%.



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21% of the population are children, compared to 30% outside. 16% of the people live in poverty, compared to 19% outside. Median household income is \$59,169 within the City River corridor, compared to \$45,766 in the River corridor outside the City.

**C. The Study Emphasizes Environmental Justice and River Access**

The Study recognizes that much of Los Angeles is park poor and income poor, and there are disparities in green access:

Much of Los Angeles is considered to be park deficient which refers to any geographic area that provides less than 3 acres of green space per 1,000 residents, as defined by California law [Robert Garcia and Seth Strongin, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for Southern California* at 14-15 (The City Project Policy Report 2011), available at [www.mapjusitce.org/socal](http://www.mapjusitce.org/socal)]. . . . In general, access to parks and acres of parkland per 1,000 residents is lowest in areas that have the highest number of families below the poverty line of \$47,331. . . . The City Project, a local nonprofit research organization was founded to find ways to improve park availability for all neighborhoods, regardless of ethnicity or income level (Garcia et al. 2009).

Study, section 3.9.1.

The Study, quoting a report by the City of Los Angeles, emphasizes the need for environmental justice along the River:

Many local organizations have stressed the importance of making sure that the River’s revitalization addresses environmental justice issues (See, e.g., the City Project’s work at: [www.cityprojectca.org](http://www.cityprojectca.org)). Of key concern in Los Angeles is the growing disparity of access to and use of open space resources, including parks, ball fields, and natural areas by those living in low income communities of color.

Study, section 3.13.3, quoting Los Angeles River Project Office, *Los Angeles River Access and Use: Balancing Equitable Actions with Responsible Stewardship* (the River Report) (2009) at page 26.

The River Report in that same passage concludes:

Whole generations are growing up in Los Angeles without any meaningful relationship to the natural environment. . . . The River offers an opportunity to redress environmental justice problems by not only providing numerous new green spaces, but also by ensuring free access to them.

River Report at 26.

The River Report emphasizes that the “City’s River revitalization efforts must balance human interests in accessing and using the River with improvements that will ensure an environment supportive of healthy, sustainable biodiversity . . . . The River offers one of the nation’s and the world’s most significant opportunities to introduce meaningful environmental value back into the post-industrial urban landscape.”

Alternative 20 best serves the environmental and health justice concerns emphasized in the River Report:

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- Compliance with equal justice laws and principles, as discussed below
- Human health including obesity and diabetes
- The use of health impact assessments in River revitalization
- Economic justice and green local jobs and wealth creation
- Transit to Trails to take urban residents on fun, educational, and healthy River, mountain and beach trips
- Shared use of parks, schools, and pools
- Public art along the River, including the Great Wall of Los Angeles and other monuments that reflect the diversity of the River and its people.<sup>3</sup>

1

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See River Report at pages 5, 20-21, 25-27, 36, 40, 43. The 2007 Los Angeles River Revitalization Master Plan is in accord with the River Report. See City of Los Angeles, *Los Angeles River Revitalization Master Plan* (April 2007) at pages 5-26 to -29 (health and active recreation), 3-24, 5-36 to -37 (public art, culture, and history along the River, including the Great Wall of Los Angeles).

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<sup>3</sup> See Robert Garcia, *Green Justice Monuments: Diversity, Democracy and Freedom*, KCET Departures (Aug. 24, 2012), at [www.kcet.org/socal/departures/landofsunshine/green-justice/green-justice-monuments.html](http://www.kcet.org/socal/departures/landofsunshine/green-justice/green-justice-monuments.html).

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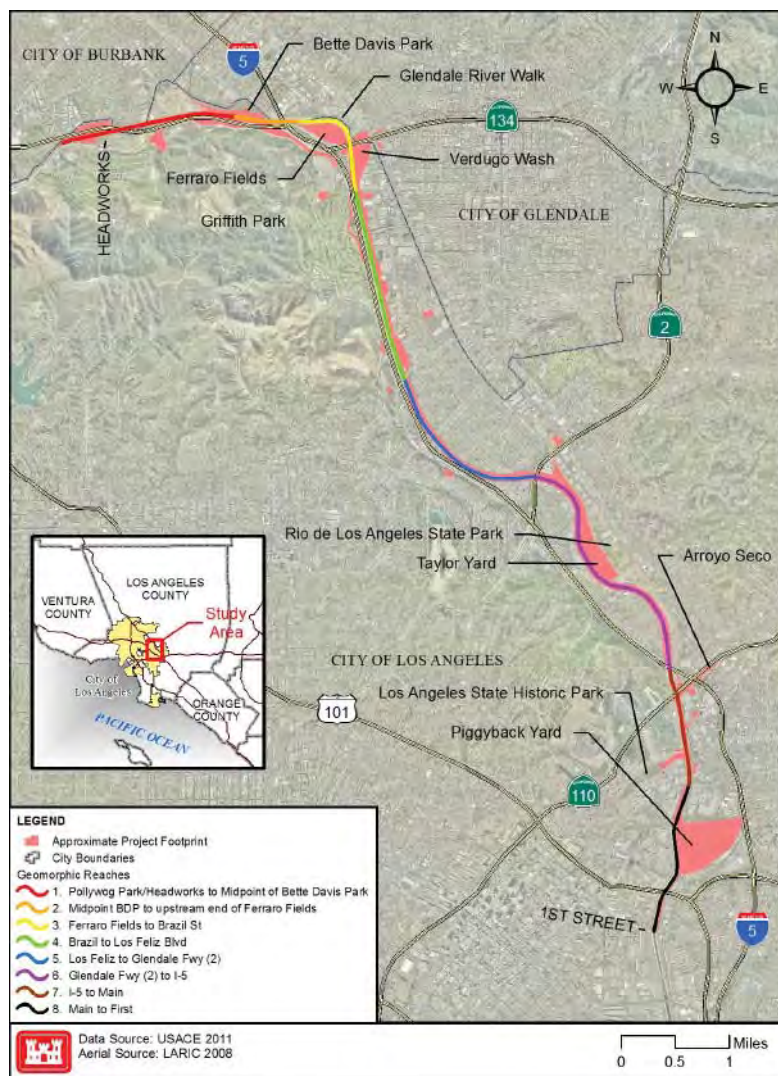


Figure ES-3 Study Area, the ARBOR Reach

*The 11 Mile Study Area along the L.A. River.*

### III. Alternative 20 Best Promotes Compliance with Equal Justice Laws and Principles

The final Study and Alternative 20 must ensure compliance with equal justice laws and principles. Section 3.13.3 includes a discussion of the President's Executive Order 12898 on Environmental and Health Justice, and presents without further analysis demographic data. That section does not discuss other applicable civil rights laws. That section does not include a proper compliance, equity, and

environmental justice analysis of the data. The final Study should conduct a proper analysis in sections 3.11, 3.13, 5.11, and 5.13, as described below.

This Section III summarizes the legal framework under applicable laws. Tables 1-6 in Appendix C summarize the legal framework. The social science and other evidence to be analyzed under these laws is presented in the following Section IV.

4

**A. The President’s Executive Order 12898 on Environmental and Health Justice**

Section 3.13.3 of the Study says that it “provides a discussion of environmental justice in accordance with Executive Order (EO) 12898.” The discussion must be strengthened in the final Study.

The President’s Executive Order 12898 on Environmental and Health Justice requires a federal agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Executive Order 12898 § 1-101 (Feb. 11, 1994); *see also id.*, §§ 1-102, 6-604.<sup>4</sup>

The Presidential Memorandum accompanying the executive order identifies Title VI of the Civil Rights Act of 1964 as one of several federal laws that should be applied to prevent minority communities and low-income communities from being subject to discriminatory effects. According to the U.S. Department of Justice, “the core tenet of environmental justice—that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minority—flows directly from the underlying principle of Title VI itself.” U.S. Department of Justice, *Title VI Legal Manual* at page 59 (2001). *Accord*, Federal Transit Authority, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, FTA C 4702.1B at Chap. I-6 (Oct. 1, 2012). FTA’s guidance comparing 12898 and Title VI is included as Table 1 in Appendix C below.

While the cited section includes “[t]he ethnic data from the 2005-2009 American Community Survey (U.S. Census Bureau 2010a) for the census tracts comprising the assessment area, as well as Los Angeles County,” reciting that data is not enough.

The final Study must discuss other applicable laws, demographics, and social science evidence through a proper compliance, equity, and environmental justice analysis, as described below.

**B. Title VI of the Civil Rights Act of 1964 and its Regulations**

The Study does not analyze the applicable Title VI of the Civil Rights Act of 1964 and its regulations. These laws should be analyzed and applied to the evidence in sections 3.13 and 5.13 of the final Study.

Title VI and its regulations prohibit both intentional discrimination, and unjustified unnecessary discriminatory impacts regardless of direct evidence of intent. The discriminatory impact standard can ferret out subtle and structural practices that have demonstrably discriminatory effects. A thoughtless policy can be as unfair as, and functionally equivalent to, intentional discrimination. As a matter of common sense, discriminatory programs or activities should be avoided in favor of those that serve

<sup>4</sup> Section 3.13.3 also cites Executive Order 13045 (directing each federal agency to identify, assess, and address environmental health and safety risks that may disproportionately affect children).

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everyone's interests fairly, effectively, and without discrimination.

“Simple justice requires that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in racial discrimination.” President John F. Kennedy’s message to Congress on June 19, 1963, quoted by Senator Hubert H. Humphrey. 110 Cong. Rec. 6543, *quoted with approval in Lau v. Nichols*, 414 U.S. 563, 569 (1974).

Title VI and its regulations ensure equal access to public resources by prohibiting recipients of federal financial assistance (including presumably all state, regional, and local park agencies here) from discriminating on the basis of race, color, or national origin in their programs or activities. Section 601 of Title VI provides: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d. Title VI applies to all the programs and activities of a recipient agency if any part of the agency receives federal funds. *See* 68 Fed. Reg. 51334 (Aug. 26, 2003) (definition of “program or activity” subject to Title VI). Federal agencies have enacted regulations to implement Title VI.<sup>5</sup>

Recipients of federal financial assistance literally sign contracts to comply with these laws as a condition of receiving federal funds. *Guardians Ass’n v. Civil Serv. Comm’n*, 463 U.S. 582, 629-30 (1983) (Marshall, J., dissenting on other grounds). The State of California, County of Los Angeles, cities along the River, and park agencies along the River receive federal financial assistance and are bound by Title VI and its regulations under these laws, and under contractual grant agreements.

The final Study should analyze revitalization of the River and Alternative 20 under the disparate impact standard, which is commonly framed as follows:

1. Will River revitalization have a disproportionate numerical impact based on race, color, or national origin?
2. Are such disparities justified by business necessity?
3. Are there less discriminatory alternatives to accomplish similar ends?

*See, e.g., Larry P. v. Riles*, 793 F.2d 969, 982, 982 n. 9 (9th Cir. 1984); *Title VI Manual* at 49-53.

The Corps should guard against intentional discrimination in River revitalization, too. The United States Supreme Court has described the kinds of circumstantial evidence that are relevant to protect against intentional discrimination, including: (1) the impact of the action and whether it bears more heavily on one racial or ethnic group than another; (2) a history of discrimination; (3) compliance with or departures from substantive norms in reaching the decision; (4) compliance with or departures from procedural norms; (5) whether decision makers knew of the impact of their actions; and (6) whether there is a pattern of racial discrimination. *See Village of Arlington Heights v. Metro. Housing Dev. Corp.*, 429 U.S. 252, 265-70 (1977); *Title VI Manual* at 43-46.

The final Study can guard against intentional discrimination and discriminatory impacts by including a compliance analysis, as described in the following sections.

### **C. The Final Study Must Include a Compliance and Equity Analysis for River Revitalization**

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<sup>5</sup> *See, e.g.*, 43 C.F.R. § 17.1 et seq. (Department of Interior); 40 C.F.R. § 7.1 et seq. (EPA); 49 C.F.R. § 21.1 et seq. (Department of Transportation).



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In positive terms, the Federal Transit Authority (FTA) has described what an applicant for federal financial assistance must demonstrate under Title VI and its regulations, and the President's Executive Order 12898 on Environmental and Health Justice. The required compliance, equity, and environmental and health justice analysis along the River includes the following steps, which should be fully analyzed in the final Study.

1. A clear description of what the agency plans to do on River revitalization.
2. An analysis of the burdens and benefits of River revitalization for all people.
3. An analysis of alternatives, including Alternative 20 as the best alternative.
4. The full and fair inclusion of minority and low-income populations in the decision-making process.
5. An implementation plan to address any compliance or equity concerns identified in the analysis.

5

See Letters from Peter M. Rogoff, Administrator, FTA, U.S. Department of Transportation, to Steve Heminger, Executive Director, Metropolitan Transportation Commission and Dorothy Dugger, General Manager, San Francisco Bay Area Rapid Transit District (Jan. 15, 2010 and Feb. 12, 2010), *available at* [www.cityprojectca.org/blog/archives/4468](http://www.cityprojectca.org/blog/archives/4468). FTA has provided detailed guidance that is a best practice for federal agencies and recipients on how to conduct compliance, equity, and environmental and health justice analyses. The Corps should follow these guidance documents in the final Study. *Environmental Justice Policy Guidance for Federal Transit Administration Recipients, Circular*, FTA C 4703.1 and pages 12, 42 (Aug. 15, 2012); FTA, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients, Circular*, FTA C 4702.1B (Oct. 1, 2012). *Accord, Coliseum Square Assoc., Inc. v. Jackson*, 465 F.3d 215, 232 (5th Cir. 2006) (12898 instructs agencies to consider the environmental justice impacts of their actions; agency's consideration of environmental justice issues reviewed under Administration Procedures Act).

The determination that the Los Angeles River constitutes "traditionally navigable waters" by EPA also makes clear that the Public Trust doctrine applies to River revitalization. The Public Trust doctrine reinforces the requirement that government agencies must distribute the benefits and burdens of revitalization equally along the River.<sup>6</sup> See Robert García and Erica Flores Baltodano, *Free the Beach! Public Access, Equal Justice, and the California Coast*, 2 Stanford Journal of Civil Rights and Civil Liberties 143, 178-79 (2005), and authorities cited.

### D. Affordable Care Act Section 1557 on Health Disparities, Wellness, and Prevention

The Affordable Care Act provides important protections against health discrimination based on race, color, national origin, limited English language proficiency (LEP), immigration status, and other characteristics in Section 1557. Section 1557, 42 U.S.C. § 18116, applies to any health program or activity, any part of which receives federal financial assistance. Section 1557 also applies to any program or activity administered by a federal executive agency. Section 1557 applies to such programs or activities along the River. Section 1557 references prior laws that protect against health discrimination, including Title VI of the Civil Rights Act.

<sup>6</sup> The United States Supreme Court decision in *Illinois Central Railroad v. Illinois*, 146 U.S. 387, 452 (1892), is the principle authority on the public trust doctrine in the United States. According to the Court, navigable waters are held in trust for the people of the state. The California Supreme Court held in *National Audubon Society v. Superior Court*, 33 Cal. 3d 419 (1983), that the values protected under the public trust doctrine include recreation and aesthetics.

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The World Health Organization defines health as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.”<sup>7</sup> In addition, the social determinants of health -- the conditions in which people live, learn, play, work, and age -- contribute to health justice and disparities.<sup>8</sup> The WHO definition of health is consistent with the broad view of health in the Affordable Care Act, which includes over 60 provisions geared towards advancing health justice through a broad range of actions, sectors, and actors. Thus, the Act includes physical activity, healthy land use, and infrastructure projects as part of its mandate. Prevention and wellness can be as or more important than health care.

The Act includes projects to promote physical activity and healthy land use as part of its mandate. *See, e.g.,* ACA sections 4001, 4201, 4306; Texas Health Institute, *The Affordable Care Act & Racial and Ethnic Health Equity Series: Report No. 4 Public Health and Prevention Programs for Advancing Health Equity* at iii-xii, 33-34, 41-46, 48 (Nov. 2013); American Public Health Association, *Issue Brief: Prevention Provisions in the Affordable Care Act* at 6-9, 11, 18 (Oct. 2010).

Why are equal justice protections necessary to protect health and life itself along the River?

The documented costs of health inequalities are great. Between 2003 and 2006, for example:

- The combined costs of health inequalities and premature death in the U.S. were \$1.24 trillion.
- Eliminating health disparities for people of color would have reduced direct medical care expenditures by \$229.4 billion.
- 30.6% of direct medical care expenditures for African Americans, Asians, and Hispanics were excess costs due to health inequalities.
- Eliminating health inequalities for people of color would have reduced indirect costs associated with illness and premature death by more than one trillion dollars.

Thomas A. LaVeist, et al., Joint Center for Political and Economic Studies, *The Economic Burden of Health Inequalities*, at 1 (Sept. 2009), *available at* [www.jointcenter.org/hpi/sites/all/files/Burden\\_Of\\_Health\\_FINAL\\_0.pdf](http://www.jointcenter.org/hpi/sites/all/files/Burden_Of_Health_FINAL_0.pdf).

The National Prevention Council promotes prevention activities across sectors. This includes:

- Support and expand cross-sector activities to enhance access to high quality education, jobs, economic opportunity, and opportunities for healthy living (e.g., access to parks, grocery stores, and safe neighborhoods).
- Identify and map high-need areas that experience health disparities and align existing resources to meet these needs . . . .

<sup>7</sup> Preamble to the Constitution of the World Health Organization as adopted by the International Health Conference, New York, 19 June - 22 July 1946; signed on 22 July 1946 by the representatives of 61 States (Official Records of the World Health Organization, no. 2, p. 100) and entered into force on 7 April 1948. Available at <http://www.who.int/about/definition/en/print.html>.

<sup>8</sup> World Health Organization, *Social Determinants of Health*, available at [http://www.who.int/social\\_determinants/sdh\\_definition/en/index.html](http://www.who.int/social_determinants/sdh_definition/en/index.html). *Accord*, Rio Political Declaration on Social Determinants of Health (Oct. 21, 2011) (World Health Organization); World Health Organization, *Meeting Report: World Conference on Social Determinants of Health, Rio de Janeiro, Brazil, 19-20 October 2011* (2012) and World Health Organization, *Summary Report: World Conference on Social Determinants of Health, Rio de Janeiro, Brazil, 19-20 October 2011* (2012).

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U.S. Department of Health and Human Services, Office of the Surgeon General, National Prevention Council, *National Prevention Strategy* (2011), p. 26, available at [www.surgeongeneral.gov/initiatives/prevention/strategy/report.pdf](http://www.surgeongeneral.gov/initiatives/prevention/strategy/report.pdf).

The implications of Section 1557 for the final Study and Alternative 20 are discussed in the following section on assessing health impacts.

## **E. The Final Study Must Assess Health, Physical Activity, and River Access**

The draft Study discusses public health and safety in terms of water safety; wildfire; methane zones; vector borne-diseases; and hazardous, toxic, and radioactive wastes in detail. *See* public health sections 3.11 and 5.11. The draft Study also mentions in passing health impacts from active recreation. *E.g.*, section 4.16.2. We agree with these health discussions as far as they go. In light of extensive social science evidence presented by the National Park Service and others discussed below, the final Study must carefully analyze human health, equal justice, and River access. A compliance analysis and health impact assessment in the final Study provides the proper framework for analyzing the evidence discussed in Section IV(A) below. Alternative 20 best serves these values.

The Los Angeles River Revitalization Master Plan includes a detailed chapter on health, physical activity, and River access. *Los Angeles River Revitalization Master Plan* (April 2007) at pages 5-26 to -29 (health and active recreation). The final Study must address these concerns too.

A health impact assessment is necessary here. “Recognizing and addressing the effects of a proposal on health equity (or health disparities) between various groups has been seen as a core task of HIA . . .” National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), at page 62. The influential NRC book recommends six steps for an HIA. The NRC HIA framework is applicable to the River Study: (1) screening, (2) scoping, (3) assessment, (4) recommendations, (5) reporting, and (6) monitoring and evaluation. *See* HIA framework chart, *id.*, at pages 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.

A health impact assessment is necessary here for several reasons. The communities in the project area have high levels of health disparities for both outcomes and exposures. Project activities clearly and significantly affect health disparities within these communities. There significant differences between alternatives in terms of health impacts. It is necessary to understand what are the potential health impacts of the proposed project, particularly those related to health disparities. Information from a well done HIA would make a difference in the decisions that are made.

The equal justice laws and principles discussed above require or facilitate a health impact assessment of River revitalization as part of the final Study. The elements of an HIA analysis are consistent with a compliance or equity analysis under Title VI of the Civil Rights Act of 1964, Title VI regulations, and the President’s Executive Order 12898 on Environmental and Health Justice. This is illustrated in Tables 2 through 6 in Appendix C. The HIA is also consistent with the requirements of an analysis under environmental laws, including the National Environmental Policy Act. *See, e.g., NRC HIA* at 110-12, 119-27, 151-59. The Corps agrees in the Study, at section 5.13.2.

The value of an HIA for the River goes beyond weighing the Study alternatives to address how River restoration relates to state sustainability initiatives (such as SB 375 on climate change), strategic growth

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initiatives (such as Health in All Policies), and the Affordable Care Act's National Prevention Strategy.

Alternatives for River restoration must be examined from a societal perspective that upholds the letter and spirit of the National Prevention Strategy. The final Study should incorporate the health and equity lens of the National Prevention Strategy. An HIA could accomplish this and help establish a standard for other agencies' efforts to support the National Prevention Strategy.

#### **F. Best Practice Example: HUD, Equal Justice, and the Los Angeles State Historic Park**

Then-Secretary of Housing and Urban Development Andrew Cuomo withheld federal funding for a warehouse project by the City of Los Angeles unless there was a full environmental impact statement, including an environmental justice analysis that considered the park alternative and the impact on people of color and low income communities. Secretary Cuomo applied Title VI and the President's Executive Order 12898 on Environmental and Health Justice in response to an administrative complaint filed by community advocates. HUD's action resulted in the creation of what is now the Los Angeles State Historic Park at the Cornfield. The 32-acre site could have been warehouses. Instead, it's a park.

Secretary Cuomo's action set a best practice example for the kind of analysis for River revitalization in the final Study. HUD's action illustrates an agency applying its administrative expertise, laws, and regulations to a public works project along the River that includes a park alternative. The HUD letter and successful administrative complaint are available on the web. *See*

[www.cityprojectca.org/ourwork/urbanparks.html#cornfield](http://www.cityprojectca.org/ourwork/urbanparks.html#cornfield). The analysis in the final Study needs to comply with this best practice example.



*The community victory at Los Angeles State Historic Park is a “heroic monument” and a “symbol of hope.” L.A. Times Magazine, July 15, 2001.*

In addition, the Corps must ensure that recipients of federal financial assistance and engage in programs or activities involving River restoration do in fact comply with the federal authorities cited above. These recipients include, for example, the County of Los Angeles, local municipalities including the City of Los Angeles, the California Department of Parks and Recreation, the Santa Monica Mountains Conservancy, Mountains and Recreation Conservation Authority, and the San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy. The Corps must conduct these analyses so that these recipients know and implement their obligations, and the public knows and receives the benefits to which they are entitled. *See, e.g., Title VI Requirements and Guidelines for Federal Transit Administration Recipients, Circular, FTA C 4702.1B (Oct. 1, 2012).*



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### IV. Alternative 20 Best Serves the Full Range of Values at Stake in River Revitalization

Alternative 20 best serves the full range of values at stake in River revitalization, including: human health and access to green space and recreation in the region, the history of discriminatory access along the River; economic values; transportation justice; Native American and spiritual, cultural and historical values; and clean water justice.

1

We again applaud the Study for including an analysis of cultural resources, transportation, recreation, environmental justice, and public involvement. The following recommendations are intended to ensure the final Study includes a proper compliance, equity, and health impact analysis.

#### A. Best Practice Examples to Analyze Health, Equal Justice, and River Access

##### 1. Best Practice Analysis: NPS on Health, Equal Justice, and Green Access

NPS explicitly recognizes that “[p]eople of color and low income populations still face disparities regarding health and access to parks” in its report *Healthy Parks, Healthy People U.S. (HP/HP Report)*. These disparities adversely impact human health. According to NPS, for example, “In regard to obesity, 36 percent of black and 35 percent of Hispanic high school students nationwide are overweight or obese, while 24 percent of non-Hispanic white high school students suffer from these conditions.”<sup>9</sup> Human health benefits include promoting a state of complete physical, mental and social wellbeing, and not merely alleviating chronic diseases including obesity and diabetes, as emphasized by NPS’s *HP/HP Report*, citing the World Health Organization.<sup>10</sup> NPS emphasizes the role that park agencies play to alleviate these disparities and promote public health.

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NPS’s recent *Healthy Parks, Healthy People Science Plan* compiles extensive social science, evidence-based research that identifies “[r]elationships between socio-economic status and participation and access to green space and outdoor recreation.” *Healthy Parks, Healthy People Science Plan* (July 2013), p. 38, citing Lee & Maheswaran (2010) and Richardson & Parker (2011). For example:

- “Green space can aid in reducing health disparities among populations (Richardson & Parker, 2011, Wells (2003).” p. 34.
- “Disparities in health conditions are influenced by socio-economic status (Sallis, Story, & Lou, 2009).” p. 38.
- “Green spaces and parks, which promote good health, can play an important role in alleviating socioeconomic health disparities (Mitchell & Popham, 2008).” *Id.*

Extensive research by The City Project and others support these conclusions, as illustrated by the map and demographic analyses of the River corridor above. See generally Robert García and Seth Strongin, *Healthy Parks, Schools and Communities: Green Access and Equity for Southern California* Policy Report (The City Project 2011), available at [www.mapjustice.org](http://www.mapjustice.org). See also Newell, J, Sister, C., Wolch J., Swift, J, P. Ghaemi, J. Wilson, and T. Longcore, *The Green Visions Plan for 21st Century*

<sup>9</sup> *HP/HP Report* at 4. See Trust for America’s Health and Robert Wood Johnson Foundation, (2011), *F as in Fat: How Obesity Threatens America’s Future*, available at <http://healthyamericans.org/report/88>.

<sup>10</sup> *HP/HP Report* at 8, citing Preamble to the Constitution of the World Health Organization as adopted by the International Health Conference, New York, 19 June - 22 July 1946; signed on 22 July 1946 by the representatives of 61 States (Official Records of the World Health Organization, no. 2, p. 100) and entered into force on 7 April 1948. See WHO FAQ at [www.who.int/suggestions/faq/en/index.html](http://www.who.int/suggestions/faq/en/index.html).



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*Southern California* (2007), p. 19-20.

Green access, health, and equal justice concerns are also well documented by the City of Los Angeles in the *Los Angeles River Revitalization Master Plan* and *River Report*, as cited above.

The final Study should analyze such health data for River restoration including Alternative 20.

## **2. Best Practice Analysis: Congresswoman Judy Chu and NPS on Health, Environmental Justice, and the San Gabriels NRA**

Congresswoman Judy Chu emphasizes public health and environmental justice as two main reasons why the region needs a national recreation area in the San Gabriel Watershed and Mountains. These reasons also apply to the restoration of the River. “Los Angeles is the most park-poor region in the United States. New York City has more park space than L.A. Lack of recreational opportunities – large or small – has severe impacts on urban populations struggling with obesity, diabetes, heart disease, and chronic illness. Opportunities to enjoy outdoor activity are vital for public health and the well being of people of all ages and walks of life.” See Congresswoman Judy Chu, San Gabriel NRA Proposal FAQs, [goo.gl/Ybdk3H](http://goo.gl/Ybdk3H).

As NPS highlights in its San Gabriels study, “Los Angeles County is one of the most disadvantaged counties in terms of access to parks and open space for children of color and people of color.” *San Gabriel Watershed and Mountains Special Resource Study & Environmental Assessment* (Newsletter #5, Nov. 2011) (*San Gabriel Study*), p. 219. NPS notes that “county averages can mask dramatic disparities in access to green space within the county.” *Id.*, citing The City Project’s research and analyses. Non-Hispanic “[w]hites currently have disproportionately greater access to parks and open space, compared to Latinos and African-Americans. These groups are 12-15 times more likely to have less park acreage per capita when compared to [non Hispanic w]hites.” *Id.* NPS further states that “the communities with the least amount of access to parks and open space tend to have higher rates of childhood diseases related to obesity such as diabetes.” *Id.* Relevant excerpts from this NPS study are included as Appendix B.

The greening of the L.A. River should be coordinated with federal efforts to green the San Gabriel River, to create a national recreation area in the San Gabriels, and to expand the national recreation area in the Santa Monica Mountains. The final Study should address these concerns.

## **2. Applying County and City Analyses of Green Access, Human Health, and Equal Justice**

The County and City of Los Angeles have recently published a Health Atlas documenting disparities in the City covering park access, health, poverty and income, and race, color or national origin. The purpose of the Health Atlas is to prioritize projects in the planning process. For that reason, the Atlas is highly relevant to the compliance and equity analysis for the Study and Alternative 20. The Health Atlas shows, for example, that green space is generally located where disproportionately non-Hispanic white and wealthy people live. Green space is generally not located where disproportionately people of color and low-income people live. Compare Map 15 (non-White and Hispanic population), with Map 63 (park access). The Atlas evaluates social determinants of health that need to be analyzed in the River Study. See, e.g., Raimi & Associates, County of Los Angeles Public Health Department, City of Los Angeles, and Los Angeles Department of City Planning, *Health Atlas for the City of Los Angeles* (2013) at pages 13-26 (demographic and social characteristics), 179-80 (community health and equity index), 55-84 (health conditions), 27-40 (economic conditions), 155-70 (housing), 144-54 (crime), 110-27 (transportation), 41-54 (education), and 128-43 (food security). The Health Atlas, as good as it is on

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economic variables and health equity, nevertheless does not include the thorough analysis of equity based on race, color, or national origin that the Final study must include under the authorities cited above. The Health Atlas is available at [planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf](http://planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf).

The Los Angeles County Department of Public Health published a report that discusses how health and wellbeing among different racial, ethnic, and economic groups varies throughout the cities and communities of the County. Green space, and resources for physical activity are disproportionately limited in low-income communities and communities of color. Often these groups are separated from other communities. The clustering of these communities limits access to outlets that may improve the lives of residents who are living in them. *See* County of Los Angeles Public Health Department, *Social Determinants of Health: How Social and Economic Factors Affect Health* (2013) at pages 2 (one path), 4-6 (what determines health), 9-13 (findings), 15 (discussion), 16 (recommendations), and 19 (a better path). The report is available at [publichealth.lacounty.gov/epi/docs/SocialD\\_Final\\_Web.pdf](http://publichealth.lacounty.gov/epi/docs/SocialD_Final_Web.pdf).

The County Health Department also analyzed obesity and green access compared to economic hardship for 128 cities and communities in the County in 2007 and found obesity rates varying widely from a low of 4% in Manhattan Beach to a high of 41% in Irwindale. The percentage of overweight and obese children tended to be higher in communities that provide fewer acres of parks, recreation areas, or wilderness areas. The report found a correlation between obesity and economic hardship. Cities or communities with a high economic hardship burden – measured as higher poverty, unemployment, median income, lower educational attainment, more dependents, crowded housing – also had higher percentages of overweight and obese children.<sup>11</sup> The City Project has further analyzed the same data to show the impact of these disparities on communities of color. *See* Robert García and Ramya Sivasubramanian, *Race and Place Do Matter: Economic Hardship, Obesity, and Equal Justice*, KCET Departures (April 18, 2013), at [www.kcet.org/socal/departures/landofsunshine/green-justice/race-and-place-do-matter-economic-hardship-obesity-and-equal-justice.html](http://www.kcet.org/socal/departures/landofsunshine/green-justice/race-and-place-do-matter-economic-hardship-obesity-and-equal-justice.html).

Other studies show that people living closer to parks are more likely to exercise regularly, leading to weight loss, increased energy, and better overall health.<sup>12</sup> **These are important lessons in support of Alternative 20 and a thorough health impact assessment in the final Study.** People in low-income areas in Los Angeles who live within one mile of a park visited that park four time more frequently and exercised 38% more than people who lived more than one mile away.<sup>13</sup> Children and adults who live in communities with parks, athletic fields, nature centers and other recreational facilities are more physically active.<sup>14</sup> Research shows that park proximity is associated with higher levels of park use and physical activity among a variety of populations, particularly youth. Further, having more parks and more park acreage within a community is associated with higher physical activity levels.<sup>15</sup> This is particularly true for low-income communities. One study found that people in low-income areas in Los Angeles who live within one mile of a park visited that park four times more frequently and exercised 38% more than

<sup>11</sup> Los Angeles County Public Health, *Preventing childhood obesity: the need to create healthy places, A Cities and Communities Health Report* (October 2007), available at [http://publichealth.lacounty.gov/wwwfiles/ph/hae/epi/chr2-childhood\\_obesity.pdf](http://publichealth.lacounty.gov/wwwfiles/ph/hae/epi/chr2-childhood_obesity.pdf).

<sup>12</sup> U.S. Centers for Disease Control and Prevention (2001), *Increasing Physical Activity: A Report on Recommendations of the Task Force on Community Preventive Services* (“Increasing Physical Activity”), available at [www.cdc.gov/mmwr/preview/mmwrhtml/rr5018a1.htm](http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5018a1.htm).

<sup>13</sup> Deborah A. Cohen, Thomas L. McKenzie, Amber Sehgal, Stephanie Williamson, Daniela Golinelli, & Nicole Lurie, *Contribution of Public Parks to Physical Activity*, 97 *American Journal of Public Health* 509-14 (2007).

<sup>14</sup> Robert Wood Johnson Foundation, *Leadership for Healthy Communities, Action Strategies for Healthy Communities: Open Spaces, Parks & Recreation*, (2009), [www.leadershipforhealthycommunities.org/content/view/298/129](http://www.leadershipforhealthycommunities.org/content/view/298/129).

<sup>15</sup> Andrew J. Mowen, *Parks, Playgrounds and Active Living, Active Living Research Synthesis* (Feb. 2010), [www.activelivingresearch.org/files/Synthesis\\_Mowen\\_Feb2010.pdf](http://www.activelivingresearch.org/files/Synthesis_Mowen_Feb2010.pdf).

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people who lived more than one mile away.<sup>16</sup>



*The community helped stop a commercial development in favor of creating Rio de Los Angeles State Park.*

## **B. Alternative 20 Best Promotes Economic Values and Local Green Jobs along the River**

The Study should ensure that the restoration promotes extensive local green jobs, apprenticeship programs, career opportunities, and contracts for women, minority, veteran, and small business enterprises that reflect the diversity of the surrounding region. This includes new and enhanced education, interpretation and collaborative programs that engage diverse cultures and the unique natural environment of the River through partnerships between local communities, non-profit social justice, environmental justice, and public art organizations, and the government.<sup>17</sup>

Section 3.13.2 of the study presents data on employment and income in the study area. That section does not analyze this data by race, color, or national origin. The Study does not analyze the impacts in that manner to assess equity in section 5.13. While temporary employment benefits during construction of each alternative are identified, the Study does not analyze who would benefit and who would be left behind. The final Study must include this analysis.

River restoration should get people back to work, strengthen the economy, and build people's feelings of confidence and self-worth in what continues to be the worst economic crisis since the Great Depression. Latinos and African Americans have been the worst hit by joblessness and drops in median wealth in the current economic crisis. "Socio-economic conditions can significantly affect a population's well-being and access to healthy living," as the City's Health Atlas notes. *See Health Atlas at 27-40.*

<sup>16</sup> Deborah A. Cohen, Thomas L. McKenzie, Amber Sehgal, Stephanie Williamson, Daniela Golinelli, & Nicole Lurie, *Contribution of Public Parks to Physical Activity*, 97 American Journal of Public Health 509-514 (2007).

<sup>17</sup> See Peter R. Orszag, Director, Office of Management and Budget, *Memorandum re: Updated Implementing Guidance for the American Recovery and Reinvestment Act of 2009*, April 3, 2009, at page 2 and *Guidance* at page 6, available at [http://www.recovery.gov/About/Documents/m09-15\\_April3.pdf](http://www.recovery.gov/About/Documents/m09-15_April3.pdf).

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U.S. Secretary of the Interior Sally Jewell announced the launch of a national youth conservation initiative, which will provide jobs, training, educational, and volunteer opportunities to millions of youth, at a news conference at San Francisco's Crissy Field on November 7, 2013. The initiative is part of Secretary Jewell's ambitious goal to engage youth with our public lands. Secretary Jewell hopes to create something similar to the public work program Civilian Conservation Corps from the 1930s, calling it the 21st Century Conservation Service Corps. See [www.cityprojectca.org/blog/archives/23276](http://www.cityprojectca.org/blog/archives/23276).

The Civilian Conservation Corps (CCC) offers valuable lessons for River revitalization to create local green jobs and economic vitality for all. The CCC was one of the most successful New Deal programs and appealed to people across political and class lines. The CCC employed 3 million young men, planted 2 billion trees, slowed soil erosion on 40 million acres of farmland, and developed 800 new state parks. Visits to National Parks increased 600% from 1933 to 1941. Unemployed youth got paid, their minds and bodies grew stronger, they contributed to society, and they stayed out of trouble as they learned the benefits of hard work, conservation, and recreation. Businesses sold goods and services to CCC camps. However, and this is just as important in terms of lessons learned, the CCC employed almost only white men, not women and not young boys and men of color. *See generally* Neil Maher, *Nature's New Deal* (2008). The final Study and Alternative 20 should promote local green jobs and economic vitality for all.

If you want parks, work for jobs – and justice. As John Meynard Keynes said, the boom, not the slump, is the time for financial austerity. *See generally* Robert García, *Green Justice: If You Want Jobs and Justice, Keep Our National Parks Open*, KCET Departures (Sept. 21, 2012), at [goo.gl/OLovi](http://goo.gl/OLovi), reprinted at National Parks Conservation Association, Park Advocate, [www.parkadvocate.org/if-you-want-jobs-and-justice-keep-our-national-parks-open/](http://www.parkadvocate.org/if-you-want-jobs-and-justice-keep-our-national-parks-open/). The Corps should apply the lessons of the CCC along the River and through Alternative 20.

Raul Macias, Founder and Director of Anahuak Youth Sports Association, a community-based organization serving children and families along the River in northeast Los Angeles, points out the benefits of green youth jobs:

There are many youths that can obtain green jobs, over the weekend, or part time. It would be a smart thing to do. Youth who are incarcerated and released from jail don't have any options for work. This could create good opportunities if the resources were to be made available. If we invest in youth now, it can save many thousands of dollars and it would be good practice to do so.

Mr. Macias joins in the submission of these comments.

### **C. Transportation Justice**

The Study recognizes the need for transportation justice along the River.

According to Southern California Association of Governments (SCAG), public parks are intended to serve all residents, but not all neighborhoods and people have equal access to these public resources. SCAG calls for a multiagency effort and public transportation to improve access for all to parks throughout Southern California (SCAG 2008).

Section 3.9.1.<sup>18</sup>

The final Study must present transportation alternatives for green access along the River. This includes

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<sup>18</sup> Southern California Association of Governments (SCAG), *Regional Comprehensive Plan*, 36-40 (2008).



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Transit to Trails to take inner city youth and their families and friends on fun, educational, and healthy river, beach, and mountain trips. NPS discusses the benefits and accomplishments of Transit to Trails in its *San Gabriels Study*, included in Appendix B (p. 179).

Transportation alternatives also include bike trails that meet the needs of people of color and low-income people. Alternatives should also serve households with limited or no access to a car, and limited transit alternatives. *See generally Health Atlas* at pages 110-14.

As Allison Mannos, founding president of the Multicultural Communities for Mobility, emphasizes, “Low income people and people of color need transportation alternatives to and along the Los Angeles River. These folks also use bikes disproportionately for commuting and pleasure, according to the City's Health Atlas.” Ms. Mannos joins in the submission of these comments.

For all alternatives, section 5.7 of the Study concludes:

Because the River corridor would be enhanced aesthetically and new multi-use walking and biking paths would be constructed, and public access would increase, more people would be expected to use the River corridor for local and recreational trips. Travel on the existing Los Angeles River Bike Path would also increase. The capacity of the Los Angeles River Bike Path and the new multi-use paths that would be constructed as part of the project should be sufficient to accommodate demand.

Further analysis must be done to ensure the benefits and burdens of these impacts are distributed equitably.

In addition to transportation alternatives for green access along the River, the Study should ensure that high-speed rail does not disproportionately impact communities of color and low-income communities along the River, or interfere with River restoration. Specifically, the rail line must not adversely impact Los Angeles State Historic Park, Rio de Los Angeles State Park, and surrounding communities, or interfere with River restoration and revitalization. *See Letter re: Concerns Regarding High-Speed Rail Through Downtown Los Angeles*, submitted to the California High-Speed Rail Authority (Sept. 20, 2012), available at [www.cityprojectca.org/blog/archives/6430](http://www.cityprojectca.org/blog/archives/6430).



*Biking on the L.A. River in Workman, CA.*



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#### **D. Native American and Spiritual Values**

The Corps has consulted with the California Native America Heritage Commission, received records of Native American resources along the River, contacted tribal representatives, and plans to “continue efforts to inform and consult with tribal representatives regarding any cultural concerns that they might have.” Section 3.6.1. *See also* section 5.6. We support this emphasis.

The Native American Heritage Commission (NAHC) is the “trustee agency” for the protection and preservation of California’s Native American cultural resources under state law. The NAHC supports “cultural preserves” to provide a higher level of protection for Native American cultural items and burial grounds. Without adequate maintenance and security, Native American cultural resources may be vandalized or destroyed, erasing an important historic link with indigenous California and the natural environment. *See* Robert García, *Native American Values, Health, and Green Access in Southern California*, KCET Departures (May 23, 2013), at [goo.gl/9sJ0xp](http://goo.gl/9sJ0xp).

Robert Bracamontes writes:

“I am Acjachemen, Nican Tlaca, indigenous to this land. For us the land gives us food, a place to play peon, a place where we are put to rest in peace, a place for ceremony, a place where life and culture are one. Some have viewed the land as something to steal, to make great profit from by taking and selling it for selfish ownership. We need our land back, we need to protect it for future generations. I hope those of you speaking about helping realize this is not a novel or a movie. This is not about a movement. This is about a living breathing tribe thousands of years old. It is about all of my living relatives, my Ancestors, and the new lives entering the world today. We cannot think that History is not a continuous fluid event. I am Acjachemen. Bob Black Crow.”

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Mr. Bracamontes joins in the submission of these comments.

#### **E. Culture, History, and Public Art along the River and in Alternative 20**

The Study discusses registered cultural resources and analyzes potential impacts to the resources in sections 3.6 and 5.6. We urge the Corps to look beyond the cultural resources that appear on the National Register of Historic Places or the California Register of Historical Resources. The final Study should promote cultural, history, and public art that celebrates the diversity of the region. The final Study should establish an inclusive procedure to work with the community to study places and works that should be designated as official landmarks and monuments.

Monuments should reflect the diversity of a place and its people. People of color, women, and Native Americans have been vital to the creation of Los Angeles. Yet with over 1,000 official cultural and historical landmarks in the City of Los Angeles, only about 100 relate to people of color, women, and Native Americans. This is astonishing, especially because the place was Indian country for about 10,000 years before contact, and Spanish or Mexican territory for hundreds of years before California joined the Union in 1850.

Marginalizing the contributions of people of color, women and Native Americans is not unique to Los Angeles. Only about 5% of national, state and local landmark designations reflect women’s history, and an even tinier proportion deal with so-called minority history, according to Dolores Hayden in her book *The Power of Place* (1997).

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According to then-Secretary of the Interior Ken Salazar, “Less than 3% of all the national landmarks that we have -- the highest designation you can receive as a historic landmark -- are designated for women, Latinos, African Americans or other members of minority groups.” Ed O’Keefe, *Ken Salazar urges more Latino-themed national parks, sites*, Washington Post (Oct. 11, 2011), available at [goo.gl/ypqBvH](http://goo.gl/ypqBvH).

The final Study should follow the guidance that NPS provides for theme studies regarding, for example, civil rights, [goo.gl/Gt8HFF](http://goo.gl/Gt8HFF); Latinos, [goo.gl/MfC66L](http://goo.gl/MfC66L); and Asian-Americans, [goo.gl/XZScoZ](http://goo.gl/XZScoZ), to promote diverse resources along the River.



*President Barack Obama dedicates César Chávez National Monument, October 2012.*

The Great Wall of Los Angeles by UCLA Prof. Judy Baca and SPARC (Social and Public Art Resource Center) is a best practice example of public art that celebrates the diversity of Los Angeles, the state, and the nation. The Great Wall, the longest mural in the world, is in the L.A. River. The Great Wall should be considered for inclusion on the national registry or as a landmark or monument. The Los Angeles River Revitalization Master Plan is a best practice example of considering these resources. *See Los Angeles River Revitalization Master Plan* (April 2007) at pages 3-24, 5-36 to -37 (public art, culture, and history along the River, including the Great Wall of Los Angeles).

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*SPARC's Judy Baca and Carlos Rogel at the Great Wall restoration along the L.A. River, 2011. Judy Baca is a professor at UCLA and Carlos Rogel is a Ph.D. student there.*

Judy Baca speaks eloquently how River revitalization and Alternative 20 should address park access for all, and public art. On park access:

If public parks are not accessible to the diversity of all people, then what spaces are?  
 Where can people meet and share the sense that they are citizens of a common land?

In neighborhoods of wealth, the phenomenon of gated neighborhoods is increasingly common. These neighborhoods grow up around the desire for security from crime and a sense of comfort at not having to deal with those different from oneself. Under such conditions, where does civic life occur? In the court rooms? In the schools? In the parks? Where do we find places of respite, open places to meet that speak to a shared sensibility about what it means to be a citizen of our city, of our state and country?

If you ask groups of students in university classes across Los Angeles to define public space, they will most inevitably name a shopping mall: the Galleria, the Beverly Center, the Third Street Promenade. Yet these are corporate spaces where all activities are orchestrated and controlled, and certain people are excluded from participation by virtue of not having (enough) money to purchase goods.

Judy Baca speaks on the lessons of public art and the Great Wall for River revitalization and Alternative 20:

Is art work like the Great Wall of Los Angeles and other public murals that are participatory and public antithetical to aesthetic practice? The question we ask ourselves early in the process of creating community-based art is this: is it possible for us as artists to fully integrate the voices of the people that live in the spaces in which our work is being done? The critical element is understanding the process. Perhaps there is no issue that has consistently plagued community cultural development work and contributed to its secondary status as fine-art work more than the issue of judging its aesthetics. It has

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long been held that the artist's personal interpretation of a particular moment in time, of an event or experience, is unique.

Community-based art is not simply one's individual notion of the creation of a masterpiece, but public work that is greatly influenced by the people for whom the work is made. The creation of public art requires a unique sensitivity, the artist's opening to interpretations that are sometimes distant from his or her own. In a sense, a method of compassionate listening is required, followed by a gestation period wherein the artist must take in the often disparate collective vision, then make it the artist's own by establishing central images stemming from the group experience. In no way does this process diminish the capability to create great public art. Sometimes the process connects instantaneously with the artist, or the artist is able to capture a strong image or idea that later has great resonance within the community.

Prof. Baca and SPARC join in the submission of these comments.

**F. Best Practice Examples: Clean Water Justice and Multibenefit Projects along the River and in Alternative 20**

Environmental laws are a tool for achieving environmental justice along the River. Thus, for example, EPA, community allies including The City Project, and the City of Los Angeles reached a \$2 billion agreement under the Clean Water Act to fix sewer system violations including noxious odors that disproportionately impacted communities of color. The agreement provides for multi-benefit park and clean water projects along the River. This is a best practice example for government, community groups, civil rights advocates, and environmentalists to work together with the Corps to achieve equal justice for all along the River. See Robert García, *The Grass Roots Fight for Clean Water Justice*, KCET Departures (March 22, 2012), at [www.kcet.org/socal/departures/landofsunshine/green-justice/clean-water-and-green-justice.html](http://www.kcet.org/socal/departures/landofsunshine/green-justice/clean-water-and-green-justice.html).



*North Atwater Creek Restoration and Park Expansion multibenefit project was funded in part by the \$2 billion Clean Water Act agreement.*

Secretary of the Interior Ken Salazar visited one of these projects North Atwater Park along the River,

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across the street from Griffith Park on the East Bank of the River. The East Bank project provides one opportunity to improve recreation and health to serve low income communities and communities of color. The site is already parkland that the city of Los Angeles is squandering for use as a service yard, toxic storage, and parking lot. The site can readily be restored as a real park in a park poor community. Within one mile of the site, there are 0.8 acres of open space per 1,000 residents. 40.8% of the people are Hispanic, 21.7% other, 18.0% Asian, and 16.9% non-Hispanic white. 20.3% live in poverty. The City Project and diverse allies have presented a conceptual plan that includes a balanced park with active and passive recreation. Scenic pathways and trails would allow for exercise and relaxing for individuals and families. Playing fields, interpretive learning spaces, and public art would enhance the park. All of these uses can be accommodated with sensitive and equitable planning that takes into account the needs of all users.<sup>19</sup> The final Study should analyze the restoration of Griffith Park on the East Bank of the L.A. River as part of Alternative 20.

Tom Hayden emphasizes the importance of water, justice, and the River:

The effort to green the Los Angeles River is near and dear to my heart. I was the state legislator who first included funding for River restoration in a state parks bond, met with the Army Corps of Engineers in D.C. about the River, and helped create the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy with Hilda Solis. Before you can “green” a River you must have a river with water running through it. The L.A. River is barely a river at all. Every big city in the United States has a river except for Los Angeles, so it’s not an environmental problem, it’s a real estate and growth problem. “Greening” the edges of the channel is one step. Land-based conservation is not enough. The Study and Alternative 20 must ensure water flows through the River.

The revitalization of the LA River can revitalize and unify the LA region. But the restoration of the river must be more than a trickle down. The staff proposal, Alternative 13, would fund only half the actual river expansion that is proposed in Alternative 20. And the project must involve more than token steps towards environmental justice, especially since the river passes through majority communities of color. If the lesser proposal is adopted, it will mean a barrier to further progress for many years ahead.

Tom Hayden has led a long and distinguished career of activism, politics, and writing dedicated to public service, and he remains a leading voice for saving the environment, reforming politics through greater citizen participation, and providing positive alternatives for inner city youth. He served in the California legislature from 1982 to 2000, first as an assemblyman and for the last eight years as a senator. He serves on the Board of the City Project. Mr. Hayden joins in these comments.

## **G. Schools, Pools, and Parks along the River**

The L.A. River School at the Sonya Sotomayor Learning Center adjoins Rio de Los Angeles State Park. This is a best practice for the joint use of schools, pools, and parks along the River. The school is a best practice for educational programs on environmental and health justice, culture, art, and history, physical activity, and the full range of values at stake along the River. The Los Angeles Unified School District has raised \$27 billion for school construction and modernization. The district has built 130 new schools

<sup>19</sup> Robert García, *Restoring Griffith Park on the East Bank of the Los Angeles River*, KCET Departures (July 12, 2012), at [www.kcet.org/socal/departures/landofsunshine/green-justice/restoring-griffith-park-on-the-east-bank-of-the-los-angeles-river.html](http://www.kcet.org/socal/departures/landofsunshine/green-justice/restoring-griffith-park-on-the-east-bank-of-the-los-angeles-river.html).



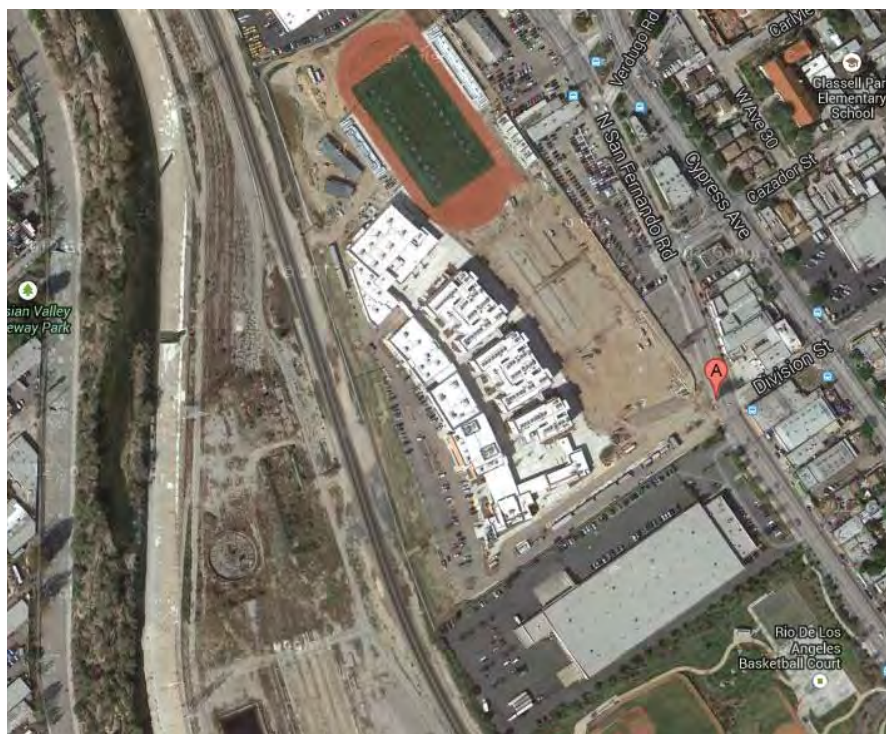
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and modernized hundreds more since 1998. Each \$50 million created 935 annual jobs, \$43 million in wages, and \$130 million in local business revenue. Hundreds of acres of land were cleaned up, including land along the River. More importantly, the future became brighter for generations of children. This is a best practice example for how River revitalization and Alternative 20 should contribute to jobs and the local green economy.



*Sonya Sotomayor Learning Center and L.A. River School adjoining Rio de Los Angeles State Park.*

## H. Implications for the Study and Alternative 20

River restoration should serve diverse needs and the full range of values at stake through a fully funded, balanced Alternative 20. Alternative 20 best serves the interests identified in these comments.

The City Project has extensively analyzed park and health disparities and the diverse values at stake under the equal justice laws and principles discussed above. The most thorough analysis is reflected in its 2011 policy report *Healthy Parks, Schools and Communities: Green Access and Equity in Southern California*. The report includes GIS mapping and demographic analyses, evidence based social science research, and participatory community based research. As documented in the report in ways that are relevant here:

- Children of color living in poverty with no access to a car have the worst access to places for physical activity in parks and green space. They suffer disproportionately from higher levels of obesity and diseases related to the lack of physical activity. *Id.* at 9-12, 26-111.
- Proximity to parks and recreation tends to support increased physical activity. *Id.* at 19-21.
- Park disparities are not an accident of unplanned growth, an efficient market in land, or rational choices maximizing personal utilities. Park disparities reflect a legacy and pattern of discriminatory land use, housing, education and economic policies dating back to the New Deal and beyond. *Id.* at 112-21.

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- Park and health disparities in Southern California are consistent with broader patterns across the nation. *Id.* at 9-12.
- The report analyzes the myriad values at stake in equal access to park and health resources. *Id.* at 19-25.
- The report analyzes park and health disparities under civil rights laws and principles, including Title VI and the President's Order on Environmental and Health Justice. *Id.* at 122-23.
- The report presents recommendations for change that are generally applicable to River revitalization, the final Study, and Alternative 20. *Id.* at 125-26.

We respectfully refer the Corps to the cited sections of that Report, which is available on the web at [www.mapjustice.org/socal](http://www.mapjustice.org/socal).

## V. Conclusion

The classic Olmsted plan *Parks, Playgrounds, and Beaches for the Los Angeles Region* called for the greening of the Los Angeles River as part of a comprehensive web of parks, schools, beaches, and forests in 1930. The successful community struggles to create Los Angeles State Historic Park and Rio de Los Angeles State Park 70 years later sparked the present work to green the River.

In far less time other cities have done far more on their urban waterways. New York City has created the Manhattan Riverfront Greenway circling the island of Manhattan.<sup>20</sup> Madrid has created a world-class urban park for the ages in Parque Madrid Río that rivals its 16th century Parque del Buen Retiro.<sup>21</sup> Greening the San Gabriel River is actually much, much further along than greening the L.A. River, providing a scenic 64-mile biking and hiking route from the mountains to the ocean. The Smithsonian Anacostia Community Museum exhibit on *Reclaiming the Edge: Urban Waterways and Civic Engagement* includes the L.A. River.<sup>22</sup> The Study and River restoration through Alternative 20 present a tremendous opportunity to implement in Los Angeles a best practice example for revitalizing urban waters and inner cities for all. **The whole world is watching.**

We urge the Corps to implement the following recommendations in the final Study and Alternative 20.

1. Ensure compliance with equal protection laws and principles that provide for equal access to the River and the benefits of River restoration. 4
2. Include a compliance, equity, and environmental and health justice analysis that addresses the impact of the greening of River on all communities, including communities of color and low-income communities, and ensures equal access to the River and the benefits of River restoration. 7
3. Conduct or facilitate a health impact assessment for River revitalization. 8
4. Promote economic vitality through green jobs programs for diverse local youth and other residents. 8

<sup>20</sup> Robert García, *Manhattan Waterfront Greenway and Hope for L.A.*, KCET Departures (May 17, 2012), at <http://www.kcet.org/socal/departures/landofsunshine/green-justice/manhattan-waterfront-greenway.html>.

<sup>21</sup> Robert García, *Parque Madrid Río, Don Quixote and Sancho Panza*, KCET Departures (April 20, 2012), at <http://www.kcet.org/socal/departures/landofsunshine/green-justice/parque-madrid-rio-don-quixote-and-sancho-panza.html>.

<sup>22</sup> Smithsonian Anacostia Community Museum, *Reclaiming the Edge: Urban Waterways and Civic Engagement* (Oct. 15, 2012 – Nov. 3, 2013), [http://anacostia.si.edu/exhibits/current\\_exhibitions.htm](http://anacostia.si.edu/exhibits/current_exhibitions.htm).

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5. Provide an implementation plan to promote equal access to the benefits of River revitalization and alleviate disparities identified in these comments.

9
6. Study, celebrate, and preserve cultural, heritage, public art, and Native American sites to reflect the diversity of the River and its people.

10
7. Consider the restoration of Griffith Park on the East Bank of the L.A. River.

11
8. Provide transportation alternatives for green access along the River, including bike trails, complete green streets, safe routes to school, and Transit to Trails that takes urban residents on fun, educational, and healthy River, mountain, and beach trips.

12
9. Ensure full and fair participation by all communities in the planning and decision making process.

13
10. Serve diverse needs and the full range of values at stake through a fully funded, balanced Alternative 20.

1
- We look forward to working together with the Corps and the Los Angeles community on Alternative 20 and this vision for an equitable restoration of the Los Angeles River now and in the years to come.

2
- 3

Sincerely,

The City Project  
Robert García, Founding Director and Counsel  
Ramya Sivasubramanian, Assistant Director and Counsel  
Daphne Hsu, Staff Attorney  
Lynnete Guzman, Program Manager

Amigos de los Ríos  
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Tomas Gonzales, Immediate Past Deputy State Director  
Kathy Jurado, District Director

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The Peace and Justice Resource Center, Director  
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Prevention Institute

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Search to Involve Pilipino Americans

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Leslie Fields, Environmental Justice and Community Partnerships, Program Director

Byron Gudiel, Sr. Organizing Manager, California

SPARC (Social and Public Art Resource Center)

UCLA Prof. Judy Baca, Artistic Director

cc: Secretary Sally Jewell, U.S. Department of the Interior  
Director Jon Jarvis, National Park Service  
Administrator Gina McCarthy, U.S. Environmental Protection Agency  
Deldi Reyes, Environmental Justice Program Manager, U.S. EPA, Region 9  
Arsenio Mataka, Assistant Secretary for Environmental Justice and Tribal Affairs, California  
Environmental Protection Agency  
General Anthony Jackson, Director, California Department of Parks and Recreation  
Mark Ridley-Thomas, Chairman, Los Angeles County Board of Supervisors  
Eric Garcetti, Mayor, City of Los Angeles



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## **Appendix A**

### **Relevant Excerpts from Army Corps L.A. River Study**

### 1 3.9 RECREATION AND PUBLIC ACCESS

2 For this analysis, the recreation resource area is defined as being a half-mile buffer on either side of the  
 3 River. The inventory of larger regional parks and other resources that exist outside the study area are  
 4 beyond the geographic scope of this assessment other than to demonstrate the lack of regional parks and  
 5 open space available within the greater Los Angeles area.

#### 6 3.9.1 Regional Context and Demand

7 The City of Los Angeles has approximately 24,000 acres of parks, with approximately 15,899 acres of  
 8 parkland under the jurisdiction of the Department of Recreation and Parks. Other agencies managing  
 9 parklands include the Los Angeles Department of Water and Power, Mountains Recreation and  
 10 Conservation Authority, the Santa Monica Mountains Conservancy, California State Parks, and the  
 11 County of Los Angeles. In all, this equates to a city-wide average of 6.26 acres of park per 1,000 residents  
 12 (Trust for Public Land 2011). The City of Glendale has 39 developed parks comprising 280 acres, or  
 13 about 1.4 acres per 1000 residents (City of Glendale 2012c). The City of Burbank operates 27 park  
 14 facilities covering 155 acres, as well as 500 acres of open space, equating to approximately 6.34 acres of  
 15 parkland per 1,000 residents (City of Burbank 2010). Including all parks identified in the assessment  
 16 presented below, the recreation resource area has an estimated 5,000 acres of park, or 38.77 acres per  
 17 1,000 residents. This value is high compared to the city-wide average due to the presence of some larger  
 18 than average parks near the study area, such as Griffith Park (the largest park at 4,210 acres) and Elysian  
 19 Park (575 acres).

21 Much of Los Angeles is considered to be park deficient which refers to any geographic area that provides  
 22 less than 3 acres of green space per 1,000 residents, as defined by California law (GreenInfo Network  
 23 2010). In particular, the industrial areas surrounding Reaches 7-8 have the least parkland, with fewer than  
 24 3 acres per 1,000 people. Other areas, particularly on the southwest side of Reaches 1-3, have greater than  
 25 3 acres of parkland per 1,000 residents, which is due to the presence of Griffith Park. In general, access to  
 26 parks and acres of parkland per 1,000 residents is lowest in areas that have the highest number of families  
 27 below the poverty line of \$47,331.

29 According to Southern California Association of Governments (SCAG), public parks are intended to  
 30 serve all residents, but not all neighborhoods and people have equal access to these public resources.  
 31 SCAG calls for a multiagency effort and public transportation to improve access for all to parks  
 32 throughout Southern California (SCAG 2008). The City Project, a local nonprofit research organization  
 33 was founded to find ways to improve park availability for all neighborhoods, regardless of ethnicity or  
 34 income level (Garcia et al. 2009).

36 Residents of Los Angeles place a high priority on the quality of natural and environmental resources. In a  
 37 study from 2000, 75 percent of those surveyed said that preserving wetlands, rivers, and environmentally  
 38 sensitive areas would be either “somewhat effective” or “very effective” at improving their quality of life.  
 39 There is also strong support for protecting cultural resources and for environmental education (Public  
 40 Policy Institute of California 2000).

#### 41 3.9.2 Recreation Opportunities in the Study Area

42 Approved uses of the River in the study area are generally limited to pedestrian, cyclist, and equestrian  
 43 trails along the banks. Some areas of the River’s watershed have recently been permitted for seasonal  
 44 fishing or canoeing/kayaking on a year-to-year basis (Sepulveda Basin), were approved in Reach 6,  
 45 between Fletcher Dr. and Egret Park, within the study area in summer 2013 (Memorial Day to Labor  
 46 Day) as a Los Angeles River Pilot Recreational Zone authorized by the City of Los Angeles and

Table 3-21 Comparison of Southern California County Economic Indicators (2010)

Area	Median Household Income	2010 Unemployment Rate	2010 Poverty Rate	2009 Median Home Value
City of Burbank	\$62,255	9.2	8.9	\$619,700
City of Glendale	\$54,163	12.7	13.1	\$641,600
City of Los Angeles	\$48,570	13.0	21.6	\$565,200
Los Angeles County	\$54,828	12.4	17.5	\$521,900
All of California	\$60,392	12.8	15.8	\$479,200
Assessment Area Tracts	\$51,941	8.7	12.3	\$492,569 <sup>(1)</sup>

(1) Average of assessment area tracts

Sources: U.S. Census Bureau 2010a, U.S. Census Bureau 2011, LAEDC 2012.

Table 3-22 Assessment Area Employment by Industry (2010)

Industry	Percent
Educational services, and health care and social assistance	18.4
Professional, scientific, and management, and administrative and waste management services	13.3
Retail trade	10.8
Arts, entertainment, and recreation, and accommodation and food services	10.6
Information	9.3
Manufacturing	8.6
Construction	6.2
Other services, except public administration	5.3
Finance and insurance, and real estate and rental and leasing	4.9
Transportation and warehousing, and utilities	4.7
Public administration	3.7
Wholesale trade	3.7
Agriculture, forestry, fishing and hunting, and mining	0.5

Source: U.S. Census Bureau 2010b.

### 3.13.3 Environmental Justice

This section provides a discussion of environmental justice in accordance with Executive Order (EO) 12898 and the protection of children from environmental health risks in accordance with EO 13045. The ethnic data from the 2005-2009 American Community Survey (U.S. Census Bureau 2010a) for the census tracts comprising the assessment area, as well as Los Angeles County, are described below.

As outlined in a 2009 City of Los Angeles report, *Los Angeles River Access and Use: Balancing Equitable Actions with Responsible Stewardship*, “Many local organizations have stressed the importance of making sure that the River’s revitalization addresses environmental justice issues (See, e.g., the City Project’s work at: [www.cityprojectca.org](http://www.cityprojectca.org)). Of key concern in Los Angeles is the growing disparity of access to and use of open space resources, including parks, ball fields, and natural areas by those living in low-income communities of color.”

Within the census tracts that encompass the study area, the Hispanic or Latino population was the dominant group, with about 50 percent of the population. The Caucasian population was second, with

about 30 percent of the population. Third was the Asian population, with 14 percent, followed by the Black population at 4 percent, and other races at 2 percent. Largely similar, the City of Los Angeles reported 49 percent Hispanic, 29 percent White, 11 percent Asian, 10 percent Black, and 1 percent other races. In the County, some differences become apparent, where the population is 60 percent White, 25 percent Hispanic, 10 percent Asian, 2 percent Black, and 1 percent other races.

In 2010, approximately 25 percent of the state's population was made up of children (those under 18 years old). Approximately 24 percent of the population in Los Angeles County was under 18 years of age (U.S. Census Bureau 2011). Within the 28 census tracts of the assessment area, approximately 22 percent of the population was under 18 years of age (U.S. Census Bureau 2010a).

As shown in Table 3-24, below, about two-thirds of the population's primary language spoken at home is a language other than English. About 45 percent of the population in the study area tracts speaks Spanish at home, 32 percent speak English, and the remaining 23 percent speak other languages. The substantial Spanish-speaking population is consistent with the demographic information summarized previously.

Table 3-23 Language Spoken at Home (Percentage in 2010)

Area	English Only	Other than English	Spanish	Other Indo-European languages	Asian and Pacific Islander languages	Other languages
Study Area Tracts	32.4	67.6	44.7	10.6	11.8	0.5
Los Angeles County	43.9	56.1	39.6	5.3	10.2	1.0
Burbank	55.9	44.1	20.1	16.0	6.3	1.7
Glendale	32.7	67.3	15.2	37.8	12.8	1.5
Los Angeles	40.3	59.7	43.6	6.7	8.1	1.4

Source: U.S. Census 2010 and 2010a. Percentages for study area tracts are based on a weighted average using population as the weights.

As shown in Table 3-25, below, poverty in the study area is generally consistent with regional data. Poverty in the study area is about 3 percent lower than the City of Los Angeles, but about 1 percent higher than in the whole County. The portions of Burbank and Glendale within the study area have higher poverty rates than those cities do overall.

Table 3-24 People in Poverty (Percentage in 2010)

Area	All People	Under 18	18 to 64	Over 64
Study Area Tracts	16.2	20.3	14.3	13.1
Los Angeles County	15.4	22.1	13.5	10.7
Burbank	8.3	9.7	8.3	5.8
Glendale	12.3	16.4	10.8	13.1
Los Angeles	19.1	27.9	16.7	13

Source: U.S. Census 2010 and 2010a. Percentages for study area tracts are based on a weighted average using population as the weights.

Disability information is not available by census tract. Table 3-26 presents the percentage of people with disabilities in Los Angeles County, the City of Los Angeles, Burbank, and Glendale. It is assumed that the same general characteristics apply to the specific study area tracts, where approximately 8 to 10 percent of the population has a disability.

project would be served by a landfill with sufficient permitted capacity and there would be no adverse impact. In addition, there are additional landfills in the area that could accommodate debris, if necessary.

Construction activities would occur over a longer time period compared to the other alternatives, so the temporary effects of construction would last longer.

### ***Operational Impacts***

Impacts to public services during operation would be similar as those described for the previous alternatives but would be slightly more extensive due to the larger project footprint. Impacts would be less than significant.

#### **5.12.4 Best Management Practices and Impact Avoidance Measures**

Measures that would be implemented and would provide BMPs for reducing impacts include:

- Development of a utility management plan
- Obtaining a Private Solid Waste Hauler Permit from the City's Bureau of Sanitation prior to collecting, hauling and transporting waste,
- Recycling/reuse of construction debris to the extent possible;
- Disposing of excess debris to City certified waste processing facility, and
- Staggering construction of daylighting outfalls in order to minimize reduction in capacity of the stormwater system.

### **5.13 SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE**

#### **5.13.1 Regulatory Framework**

##### **Federal**

Federal Executive Order 12898 was signed by President Bill Clinton on February 11, 1994, to focus Federal attention on the environmental and human health conditions of minority and low-income populations with the goal of achieving environmental protection for all communities. The Order directed Federal agencies to develop environmental justice strategies to aid Federal agencies identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. Environmental justice concerns may arise from impacts on the natural and physical environment, such as human health or ecological impacts on minority populations, low-income populations, and Indian tribes, or from related social or economic impacts.

##### **State**

In addition to its prioritization by the Federal government, California was one of the first states in the Nation to pass legislation to codify environmental justice in state statute, defining "environmental justice" as "The fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (Government Code Section 65040.12)

##### **Local**

The City of Los Angeles General Plan, Housing Element includes the City's policies in regards to housing issues (City of Los Angeles 2001), Policy 2.3.2 states that the City will "...allow for the provision of sufficient public infrastructure and services to support the projected needs of the population and businesses of the City within the patterns of use established in the community plans."



### 5.13.2 Significance Criteria

The proposed project alternatives could cause significant impacts related to population, socioeconomics, and environmental justice if they would be inconsistent with the City of Los Angeles' General Plan, Housing Element in the following ways (City of Los Angeles 2002):

- Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure),
- Cause growth (e.g., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year(s) of project occupancy/buildout, or
- Cause a substantial number of residents, businesses, or employees to be displaced (includes displacement of affordable housing), necessitating the construction of replacement housing elsewhere.

Additionally, alternatives would cause significant impacts under NEPA if they would:

- Have disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and, or low-income populations. The CEQ guidance identifies three factors to be considered to the extent practicable when determining whether environmental effects are disproportionately high and adverse (CEQ, 1997):
- Whether there is or would be an impact on the natural or physical environment that significantly (as the term is employed by NEPA) and adversely affects a minority population, low-income population, or Indian tribe. Such effects may include ecological, cultural, human health, economic, or social impacts on minority communities, low-income communities, or Indian tribes when those impacts are interrelated to impacts on the natural or physical environment;
- Whether the environmental effects are significant (as the term is employed by NEPA) and are or may be having an adverse impact on minority populations, low-income populations, or Indian tribes that appreciably exceeds or is likely to appreciably exceed those on the general population or other appropriate comparison group; and
- Whether the environmental effects occur or would occur in a minority population, low income population or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards.

### 5.13.3 Environmental Impacts

#### No Action Alternative

##### *Construction Impacts*

No impacts to socioeconomics would occur from construction under this alternative because construction would not occur.

##### *Operational Impacts*

The socioeconomic assessment area consists of a predominantly residential and densely populated area in Los Angeles County. Due to the existing dense level of development, it is unlikely that changes in the local or regional economy will result in drastic changes in land use, population, or demographics in the assessment area. Other factors such as gentrification, poverty rates, and local businesses can affect the local economy and land uses, but no clear trends have emerged at the time of this assessment. Any changes that do occur in the period of analysis would likely be coincident with larger regional trends and would not materially alter the conditions in which an ecosystem restoration study would be constructed.

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## **Appendix B**

### **Relevant Excerpts from *NPS San Gabriel Study***



Draft

# San Gabriel Watershed and Mountains

*Special Resource Study and Environmental Assessment*

September 2011

Produced by the Pacific West Regional Office  
Park Planning and Environmental Compliance  
National Park Service  
San Francisco, California

U.S. Department of the Interior  
Washington, DC



Top, left to right: Frank G. Bonelli Regional Park, NPS photo; Inspiration Point, Angeles National Forest, NPS photo.  
Bottom: Eaton Canyon Natural Area, NPS photo.



## Recreation Needs and Opportunities

### INTRODUCTION

The Los Angeles metropolitan region has struggled to provide adequate recreation opportunities for its growing urban areas since its first population boom at the end of the 19th century. Throughout the 20th century, population growth and development in the region has far outpaced the creation of recreational facilities. This has occurred despite the completion of previous comprehensive recreation studies that called for investment in more recreational facilities.

Deficiencies in recreation and open space remain for much of the Los Angeles Region. Over 15 million people live in the larger metropolitan region and the California Department of Finance projects another 13 million residents by 2050 (California Department of Finance 2007a). With existing recreation and park areas in most cases already taxed beyond capacity, it is safe to assume that significant efforts will need to take place to ensure sufficient opportunities for diverse recreational experiences in the future. In addition, communities of color and children have disproportionately low access to parks and open space in Los Angeles County. See also Chapter 7, *Environmental Consequences*, for a more discussion on current recreation trends.



### NEEDS

#### Recreation Demand in Urban Areas

In addressing present and future open space concerns for the study area, disparities must be addressed regarding the disproportional access to park and recreational space. **As recent reports from The Trust for Public Land (TPL) and the City Project indicate, public access, predominantly of minority populations, to parks and recreation facilities is a serious concern.** According to TPL, Los Angeles County ranks at the bottom in comparison to the nation's seven major cities (Boston, New York, San Francisco, Seattle, San Diego, and Dallas) in terms of providing access to parks for children. In fact, the report, based on 2000 census data, indicates

that “more than 1.5 million children in Los Angeles County do not live within walking distance of a public park.” In most cases, parks in the Los Angeles region are not located near those areas with high concentrations of young children (Trust for Public Land 2004).

The issue of accessibility is of particular concern when measuring existing open and park space in comparison to population densities.

**As demonstrated in the City Project's work in Los Angeles, many families in the low income neighborhoods of the region often do not have cars nor are near public transportation systems that allow for access to regional parks.** This is particularly true in the case of the 651,874-acre Angeles

National Forest which, in making a simple per capita measurement (open space divided by population size), appears to indicate a sizeable measurement of potential recreation space in comparison to a local urban population. However, the aforementioned barriers to access and the inaccessibility of much of the forest's terrain, skews this measurement significantly.

Public interest in open space and recreation in the region is significant and concerted efforts are underway by a myriad of non-profit organizations, local and municipalities, community groups, and private and public groups to procure and maintain open space in various areas throughout the Los Angeles region. Furthermore, the \$2.6 billion Proposition 40 has further sparked this interest in public space allowing for funds to be allocated for environmental and park projects throughout the state of California (Trust for Public Land 2004).

Regional stakeholders such as the state land conservancies, land trusts, and other non-profits have worked diligently in their respective efforts to maintain and acquire park and open space in the region. The Rivers and Mountains Conservancy (RMC), one of eight conservancies in the California Resources Agency, is working to “preserve open space and habitat in order to provide for low-impact recreation and educational uses, wildlife habitat restoration and protection and watershed

Photo caption: The Santa Clara River. 2007. NPS photo.

Job training and conservation stewardship programs for youth and nearby community members would be offered. In addition to the positions listed above, area youth would be encouraged to be involved with service organizations by applying for positions through existing programs such as the Student Conservation Association, Youth Conservation Corps, AmeriCorps and other organizations which expose youth to the conservation and stewardship of our public lands.

## LAND ACQUISITION

Lands within the NRA would remain under their current jurisdictions, with each land management agency continuing to fund its own operations. As almost 90% of the land in the proposed NRA is already protected for recreation and conservation by partner agencies (158,000 of approximately 178,000 acres), land acquisition needs would be small. Much of the remaining 20,000 acres are comprised of urbanized lands in commercial and residential use that would not be appropriate or feasible for NPS land acquisition. The NRA partnership would be eligible to request NPS funding for land acquisition within the NRA for acquisition of small areas with resource significance such as a historic site or open space with native habitat. However, it should be noted that such funding is extremely limited. Funding for land acquisition would also be available from partner agencies and through local fundraising efforts.

## OPERATIONAL AND VISITOR FACILITIES

Construction of new administrative facilities for NPS operations and management would not necessarily be required to support the proposed NRA. Given the existing amount of office space available in and near the proposed NRA, it is likely that the NPS could lease administrative and operational facilities from partner agencies or through existing office space available in the area. There may also be opportunities to adaptively reuse a historic building or property through leasing if the NPS acquired land that contained such facilities. The NPS could also use partner facilities or adaptively reuse buildings to provide visitor facilities. If established, the NRA partnership would identify specific operational and visitor facilities needs through a general management plan.

## CASE STUDY: TRANSIT TO TRAILS PROGRAM

### Background

Transit to Trails is a pilot project created by a partnership between the NPS, the Anahuak Youth Association, The City Project, Mountains and Recreation Conservation Authority, and an anonymous donor. Transit to Trails takes inner city youth and their families on different mountain, beach, and river trips.

### Program Description

- Santa Monica Mountains NRA partners with Transit to Trails to provide buses that allow school and community groups to visit the national recreation area.
- By bridging the gap between urban youth and the outdoors, Transit to Trails is not only encouraging physical activity, but also a healthy and better mental lifestyle.
- Currently, the City Project is hoping to expand the Transit to Trails pilot project to throughout Southern California and beyond. It is encouraging other park agencies to join the Mountains Recreation Conservation Authority and the NPS in providing buses, rangers, and programs for Transit to Trails.

### Accomplishments

- Transit to Trails provides more opportunities for area youth and their families to learn about water, land, wildlife, cultural history, and engage in physical activity through recreational opportunities.
- It also helps reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean by providing a more accessible, public transportation.

### Sources:

<http://www.cityprojectca.org/ourwork/forests.html>,  
Public Transportation to Local National Forests Study  
by USC Dept. of Geography



in the study. Some commenters suggested that federal recognition would bring positive attention to the area and would help the local economy and tourism. Others worried that designation could bring about increased traffic, noise, waste, and congestion associated with increased tourism. This was particularly a concern in the Antelope Valley area, where residents worried that increased recreation would require commercial development which could negatively impact rural communities.

The impact of special designations on visitation at existing parks or recreation areas was studied to provide context for the impact analysis. Recent research conducted on eight changes in national park unit designation between 1979 and 2000 shows that conversions have “substantial and persistent” effects on annual visitation. These changes appear to be more important to national visitors than to local or regional users. This particular research is limited to conversions of units already in the national park system, and its results are applicable in times of economic well-being. For the units studied, an immediate annual visitation increase of about 6 percent was experienced and then maintained over time (Weiler 2005).

### Adequacy of Park and Recreation Areas in the Study Area

The process of prescribing a standard for the level of service for park and recreation facilities has long been problematic. The U.S. Department of Housing and Urban Development (HUD) recommends 2.5 acres of parkland for every 1,000 residents, although many consider this ratio to be low. The National Recreation and Parks Association (NRPA) gave acreage recommendations in *Recreation, Park and Open Space Standards and Guidelines* (1983) and *Park, Recreation, Open Space and Greenway Guidelines* (1996). The NRPA acknowledged that local condition and community desires should be considered in adopting local standards and stated a standard of 6-10 acres for every 1000 residents.

As described in Chapter 2, *Resource Description*, current studies on the adequacy of recreational areas in the Los Angeles Region show approximately 9.1 of recreation acres per 1,000 residents (Trust for Public Land 2004). However, county averages can mask dramatic disparities in access to green space within the county (The City Project 2007). In 2004, the Los Angeles County Department of Parks and Recreation completed the Strategic Asset Management Plan for 2020. Based on the projected population growth, the county estimated

**Table 14: Visitation to Major Recreation Destinations within the Study Area**

Facility	Total
Frank G. Bonelli Regional Park	463,743
Santa Fe Dam Recreation Area	753,993
Whittier Narrows Recreation Area	1,727,841
Whittier Narrows Natural Area	44,520
Devils Punchbowl County Park	99,421
Pio Pico State Historic Park	7,500 (FY 2007/2008)
Angeles National Forest	3.5M (2010)
Sources: (Los Angeles County, Rupert, pers. comm, 2010; USFS 2009; Friends of Pio Pico State Historic Park, Schoff, pers. comm. 2011)	
Note: Annual visitation data was not available for the Puente Hills Landfill Native Habitat Preserve.	

that it would not meet its standard of four acres of parkland per 1,000 residents by 2020 for four of its five supervisorial districts. Only the rural north county area, which includes the Antelope Valley portion of the study area, would meet this goal (Los Angeles County 2008).

Quantity and density, however, are not the only measures. If park, open space, and recreation amenities are not accessible to all residents, their benefits cannot be fully realized. Factors such as proximity to open space, safe and accessible transportation and walking routes, the presence of obstacles such as freeways, railroads and other physical barriers also affect access. Open space is also not often equitably distributed. Areas that fall well below meeting the standards for parks and recreation facilities are described as being “park-poor.”

In many park and recreation assessments, a ¼ mile to ½ mile radius is used to measure access to local parks. These distances are used because they represent areas that can be accessed by a 5 to 10 minute walk. Three separate analysis of the adequacy and distribution of recreational areas in the Los Angeles Region have concluded that while some communities have ample parks and recreational areas, many are severely lacking. Those communities with adequate accessibility to parks and recreational areas tend to be more affluent with a majority of non-Hispanic whites.

Visiting regional areas such as the ANF and the Santa Monica Mountains National Recreation Area pose transportation challenges for many residents (Los Angeles County 2008). Recent studies have found that statewide, Los Angeles County is one of the most disadvantaged counties in terms of access to parks and open space for children and people of color (The City Project 2007, Trust for Public Land 2004). A study by the Trust for Public Lands found that with its high concentration of open space in areas far from its most densely populated communities, the Los Angeles area offers its children the worst access to parks among the cities evaluated nationally (see Table 16). A study on access to parks and park facilities conducted as part of the Green Visions Plan found that one third or less of parks in the San Gabriel Valley area appear to have transit (Sister, C., Wilson, J.P., and Wolch, J. 2008).

The communities with the least amount of access to parks and open space tend to have higher rates of childhood diseases related to obesity such as diabetes. According to the Centers for Disease Control, Americans living closer to parks

are more likely to exercise regularly, leading to weight loss, increased energy, and better overall health (Centers for Disease Control and Prevention 2001). The California Center for Public Health Advocacy analyzed the 2004 California Physical Fitness Test of 5<sup>th</sup>, 7<sup>th</sup>, and 9<sup>th</sup> graders. The analysis shows that among students in Los Angeles County, 31.3% are overweight. Overweight children face a greater risk of developing many health problems during childhood, including Type 2 diabetes, high blood pressure, asthma, orthopedic problems and gallstones, as well as low self-esteem, poor body image, and depression. Overweight children are more likely to be obese as adults, putting them at a much higher risk for heart disease, cancer, stroke, and diabetes later in life (California Center for Public Health and Advocacy 2006).

People of color are less likely to have adequate access to parks in the Los Angeles area. Studies by the Green Visions Plan for a 21<sup>st</sup> Century Southern California and the City Project both found that Whites currently have disproportionately greater access to parks and open space, compared to Latinos and African-Americans. These ethnic groups are 12-15 times more likely to have less park acreage per capita when compared to Whites (Sister, C., Wilson, J.P., and Wolch, J. 2008, The City Project 2007).

Los Angeles County trends for access to parks, as described previously, correlate with trends within the study area. Access to parks and open space is readily available to communities in the Antelope Valley, Soledad Basin, and wealthier communities in the San Gabriel Mountains foothills. The map “Park Acres Per 1,000 Residents,” on the following page, includes park and recreation acreages for study area cities and communities. The map conveys that foothill communities and communities in the northern portions of the study area have the largest amounts of parks and recreation space per 1,000 residents. Many of the more urban communities in the San Gabriel Valley have smaller park acreages per 1,000 residents and fall well below the Los Angeles County standard of 4 acres per 1,000 residents. Given the limited availability

**Table 15: Standards for Parks and Open Space**

Standard	Acres/1,000 Population
HUD	2.5
National Recreation and Parks Association Park Acreage/Population Standard	6.25-10.5
Los Angeles County	4

effects of each alternative, however, could result in a small, net beneficial condition to some local communities as a result of improved urban quality, land protection, and economic benefits from recreation and conservation. However, the total cumulative effect is expected to be more dependent upon regional economic conditions and population increases (and distribution) over time than on the actions taken as a result of this study.

## Conclusions

The action alternatives positively address current and future recreation needs. In terms of economic benefit associated with these objectives, the no action alternative would have the least benefit and alternatives A, C, and D would have beneficial effects to varying degrees. Alternative D, due to its geographic scope, particularly in urban areas, has the greatest potential for beneficial impacts to quality of life and other socioeconomic indicators.

Increased visitation would represent an adverse impact on infrastructure and social systems. Since visitation might be expected to increase in each of the action alternatives, infrastructure impacts would likely increase proportionally. The adverse impact in alternative A would likely be negligible, increasing to minor in both C and D. With congressional action approving the implementation of any of the action alternatives, or variants thereof, further planning would be undertaken. Additional environmental analysis would be prepared to look at site and area-specific activities and alternatives. Through that analysis, more specific conclusions can be drawn regarding direct, indirect and cumulative impacts. Joint planning efforts among stakeholders, and subsequent agreements, would be designed to optimize between the economic benefits and social costs so that the former is maximized and the latter is mitigated.

## Impact Analysis - Socially or Economically Disadvantaged Populations Socioeconomic Impacts (Environmental Justice)

As the analysis in the *Recreation Use and Visitor Experience; Affected Environment* describes, economically disadvantaged populations in the study area lack access and the ability to partake of existing opportunities due to lack of close-to-home open space, lack of effective transportation, lack of culturally advantageous facilities or opportunities, and lack of knowledge about recreation and natural resources. Under current conditions, all contribute to an impact on these populations. As stated, each action alternative attempts to remedy these current conditions to provide a net beneficial result.

### BACKGROUND ON ENVIRONMENTAL JUSTICE

Environmental justice must be considered in every major federal action by assessing environmental factors that negatively or disproportionately affect minority populations. Pursuant to Executive Order 12898, promulgated by President Clinton in 1994, federal agencies “shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.”

The NPS has numerous partnerships programs with youth corps and conservation organizations that serve as a means to introduce minority and low income children and young adults to environmental and conservation issues.

Youth corps and job corps partnerships provide a solid environmental learning experience for the youth involved, while at the same time leaving a legacy of work which significantly benefits the parks and community.

The NPS also seeks to identify opportunities to develop partnerships with Tribal governments, consistent with mission needs to provide necessary technical assistance to enhance tribal capacity to address environmental, health, and welfare concerns.

### NO ACTION ALTERNATIVE

A portion of the local population can be categorized as socially or economically disadvantaged and potentially affected by each of the alternatives. Population growth trends over time will likely exacerbate the amount and intensity of

this condition. This equates directly to socially and economically disadvantaged populations who lack the means of access, and the ability to partake of existing opportunities due to physical barriers (e.g. adult and childhood obesity or other ailments). The existing deficiencies in open space, lack of effective transportation connecting communities to recreation opportunities, lack of culturally advantageous facilities or opportunities, and lack of knowledge about recreation and natural resources, under current conditions, all contribute to moderate adverse impacts on these populations.

### ALTERNATIVE A

Alternative A would have a generally beneficial impact on socially and economically disadvantaged populations by providing an improved recreational experience at the ANF. However, it would likely represent only a minor improvement for communities that are currently underserved for recreation. Of all the alternatives, this one places the least emphasis on developing new effective partnerships and cooperative management efforts that have the best chance of providing a remedy for these populations. Also, it would do little to increase access to recreation from underserved populations or provide close-to-home opportunities in urban communities.

### ALTERNATIVE C

Alternative C would have a greater beneficial impact on these populations, with efforts applied specifically in urban areas close to the San Gabriel River where some communities are underserved and economically disadvantaged. The alternative potentially provides job training and opportunities within these communities that have the potential both to improve economic access for recreation, but also to build programs and provide awareness regarding opportunities. To the extent that recreation opportunities can be designed to fit cultural preferences (for example, large group picnic and camping areas) for local disadvantaged populations, the greater will be the beneficial results. The development of effective and diverse partnerships in this alternative would also serve to build programs and cooperative agreements with entities that represent disadvantaged groups so that the necessary results can be obtained.

### ALTERNATIVE D

Again, due its expanded geographic and programmatic scope, alternative D holds the greatest potential benefit for socially and economically disadvantaged populations. Also, it presents the most opportunities for new close-to-home recreation opportunities for areas that are

currently underserved. In short, this alternative provides the best framework for implementing NPS' environmental justice policy as outlined above.

### CUMULATIVE IMPACTS

Population growth trends in the study area and the surrounding region are likely to put additional pressure on available open space. Considering that public lands in this area are currently among the most heavily visited within the system, recreation opportunities and qualities are likely to diminish if nothing is done. The study area alternatives seek to ameliorate the condition to a greater or lesser degree. Therefore, the cumulative effect of growth and development trends, plus the effects of each alternative, would likely result in a net beneficial condition in regard to recreational opportunities for disadvantaged populations within the study area. The overall level of cumulative impact, considering factors that exacerbate issues for the socially and economically disadvantaged, would decline as compared to the no action alternative.

### Conclusions

In general, it is anticipated that each of the action alternatives is likely to improve conditions regarding health and well-being of disadvantaged populations. Clearly, it is the stated intent of this congressionally-mandated study to do so. To do nothing would leave these populations to current trends in development. The creation of new public land open spaces would be advantageous. At the same time, the proposed changes in land use on existing public lands is not likely to affect commercial or non-commercial resources and values that economically disadvantaged populations might be dependent upon under current conditions.

The partnership program and stakeholder agreements set forth particularly in alternatives C and D would meet the intent of the U.S. Department of the Interior and NPS Environmental Justice strategy as outlined above. Nevertheless, it is important to seek effective involvement of potentially affected social and economically disadvantaged populations when a congressionally mandated plan goes forward.





National Park Service  
U.S. Department of the Interior

# **San Gabriel Watershed and Mountains Special Resource Study & Environmental Assessment**

Errata  
October 2012





# **San Gabriel Watershed and Mountains Special Resource Study & Environmental Assessment**

## **Errata October 2012**

The following errata provide factual corrections, additions, and revisions to the *Draft San Gabriel Watershed and Mountains Special Resource Study and Environmental Assessment (draft study report/EA)*, dated September 2011. Changes to the draft study report/EA, and references to the page number where the change has occurred are provided. The reader must have access to a copy of the draft study report/EA in order to fully understand the changes.

Additional copies of this document and the September 2011 report can be downloaded from the internet at [www.nps.gov/pwro/sangabriel](http://www.nps.gov/pwro/sangabriel). Printed copies are also available on request from the address below.

National Park Service  
Attn: San Gabriel Watershed and Mountains Special Resource Study  
333 Bush Street, Suite 500  
San Francisco, CA 94104

## Chapter 7 Environmental Consequences

Page 205, Table 12, Row 1, Second Column, revised to include additional language:

No specific actions will be taken in a floodplain due to completion of this study. The outcome of the study will be a recommendation to Congress. If Congress takes action, then new environmental analysis would be undertaken prior to specific implementation actions that may affect floodplains.

Page 205, Table 12, revised to include new row:

<b>Mandatory Topic</b>	<b>Discussion and Rationale</b>	<b>Disposition</b>
Greenhouse Gas Emissions (GHG)	Completion of the study does not itself affect greenhouse gas emissions, nor does it propose specific management actions which would affect greenhouse gas emissions. If Congress takes action, then new environmental analysis would be undertaken prior to specific implementation actions that may affect (GHG).	This topic is dismissed from further analysis

Page 225, 2<sup>nd</sup> column, following last paragraph, revised to include additional demographic information about minority and low income populations:

### Minority and Low Income Populations

In February of 1994, President Clinton issued Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The Executive Order identifies agency responsibilities:

To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Marianas Islands.

The Council on Environmental Quality provided *Environmental Justice: Guidance under the National Environmental Policy Act* in December 1997 to assist federal agencies in addressing environmental justice in their NEPA procedures. This guidance defines low-income population, minority, and minority population as follows:

**Low-income population:** Low-income populations in an affected area should be identified with the annual statistical poverty thresholds from the Bureau of the Census' Current Population Reports, Series P-60 on Income and Poverty. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect.

**Minority:** Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.

Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds (CEQ 1997).

Based on data from the U.S. Census Bureau for 2010 for 49 communities in the study area, 41 communities had a minority population greater of than 50%; eight communities had a minority population of less than 50%. Data was not available for Bradbury, Irwindale, and Industry communities. Minorities represented from 23% to 96% of the population in those 49 communities. Individuals identified as members of minority groups totaled nearly 2.1 million people in the 49 communities, 74% of total study area population (U.S. Census Bureau 2012).

The total population of the 49 communities for which data was available was approximately 2.8 million (Note: some of the 2.8 million may fall outside of the study area as many of the communities are only partially included), with 74% representing minority groups, and 11% being below the poverty level. About 11% of the people in the study area had incomes below poverty level. In 22 out of 49 communities in the study area more than 10% of the population is below poverty, with the percent of the population within each community below poverty level ranging from 4.1 to 20.7%.

**Page 242, first column, third paragraph, last sentence, revised as follows:**

This would be done in partnership with water agencies, the Los Angeles County Department of Public Works and the U.S. Army Corps of Engineers.

## Chapter 8 Consultation and Coordination

**Page 218, second column, second paragraph, second sentence revised as follows:**

However, county averages can mask dramatic disparities in access to green space within the county (The City Project 2007 and 2011).

**Page 219, first column, fourth paragraph, second sentence revised as follows:**

Recent studies have found that statewide, Los Angeles County is one of the most disadvantaged counties in terms of access to parks and open space for children and people of color (The City Project 2007 and 2011, Trust for Public Land 2004).

**Page 220, second column, second paragraph, last sentence revised as follows:**

These ethnic groups are 12-15 times more likely to have less park acreage per capita when compared to Whites (Sister, C., Wilson, J.P., and Wolch, J. 2008, The City Project 2007 and 2011).

## References

**Pages 301 to 302, revised to add the following new references:**

**California Department of Fish and Game**

2011a *California Natural Diversity Database, Special Vascular Plants, Bryophytes, and Lichens List.*

Available online at: <http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf>

2011b *California Natural Diversity Database, Special Animals List.* Available online at:

<http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPAnimals.pdf>

**Page 303, revised to add new reference:**

[CEQ] Council on Environmental Quality, Executive Office of the President

1997 *Environmental Justice Guidance Under the National Environmental Policy Act.* Washington, D.C.

**Page 303, revised to remove reference:**

The City Project

2007 *Healthy Parks, Schools and Communities: Mapping Green Access and Equity.* Available on the internet at: <http://www.cityprojectca.org/ourwork/mappinggreenaccess/index.html>.

**Page 303, revised to add new reference:**

The City Project

2011 *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for Southern California.* Available online at: <http://www.cityproject.org/greenjustice>

**Page 306, revised to add new reference:**

King, Chester and and Thomas C. Blackburn

1981 "Tataviam." In Heizer, Robert, volume editor, *Handbook of North American Indians, Vol.8: California.* Smithsonian Institution Press, Washington D.C.

**Page 307, revised to add new reference:**

Magney, David, David Magney Environmental Consulting

2012 Personal communication with Barbara Butler, National Park Service, Pacific West Region, January 2012.

**Page 308, revised to add new reference:**

NPS

2010 *Overview of the History of American Indians in the Santa Monica Mountains (DRAFT).* Prepared by Chester King for the Santa Monica Mountains National Recreation Area.

**Page 310, revised to add new reference:**

Robertson, Glenn

2004 *Whittier Hills Ecological Preserve Master Plan and Proposal for Puente-Chino Hills Open Space District.* Whittier, California.

**Page 312, U.S. Census Bureau, revised to add new reference:**

2012 *State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building*

*Permits, Consolidated Federal Funds Report. Available online at:*  
<http://quickfacts.census.gov/qfd/states/06000.html>]. Last Revised: Tuesday, 18-Sep-2012.

**Page 313, revised to add new reference:**

[USFS] United States Forest Service, Department of Agriculture

2011     *Angeles National Forest Threatened, Endangered, Proposed, Candidate, and Forest Service Sensitive Plants and Animals Which May Occur Within the Angeles National Forest, Los Angeles and San Bernardino Counties, California.* Animals Revised March 2004; Plants October 1, 2006; Status of Species Updated September 21, 2007; Scientific Names Updated February 10, 2011.



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**Appendix C**

The following tables summarize the analyses under:

Table 1. Comparison of Title VI and Environmental Justice Authorities

Table 2. Executive Order 12898 on Environmental and Health Justice

Table 3. Compliance or equity analysis FTA

Table 4. Disparate impact standard Title VI regulations

Table 5. Intentional discrimination standard Title VI statute

Table 6. National Research Council health impact assessment

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**Table 1: Comparison of Title VI and Environmental Justice Authorities**

Key Aspects of the Authorities <sup>23</sup>	Title VI	Environmental Justice
<b>What is the basis for the authority?</b>	Title VI is a Federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.	The basis for addressing environmental justice is an Executive Order: EO 12898 directs each Federal agency to “make achieving environmental justice part of its mission.” The EO is intended to improve the internal management of the executive branch . . .
<b>What is the purpose of the authority?</b>	Title VI prohibits recipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance.	EO 12898 calls on each Federal agency to achieve "environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations...."
<b>To whom does the authority apply?</b>	Title VI is a Federal law that applies to recipients and subrecipients of Federal financial assistance (e.g., States, local governments, transit providers), and not to DOT itself.	EO 12898 applies to Federal agency actions, including DOT's and FTA's actions. Title VI is one of the tools used by Federal agencies to implement this directive.
<b>What does the authority require, and of whom?</b>	Under Title VI, DOT has the responsibility to provide oversight of recipients and to enforce their compliance with Title VI, to ensure that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin.	EO 12898 is a directive from the President of the United States to Federal agencies intended to improve the internal management of the Federal government. DOT issued its own Order implementing EO 12898, and updated the Order in May 2012 (Order 5610.2(a)).
<b>What does the authority say with regard to negative effects or impacts?</b>	In accordance with 49 CFR part 21 and Title VI case law, if an otherwise facially neutral program, policy, or activity will have a discriminatory impact on minority populations, that program, policy, or activity may only be carried out if (1) the recipient can demonstrate a substantial legitimate justification for the program, policy, or activity; (2) there are no comparably effective alternative practices that would result in less-disparate impacts; and (3) the justification for the program, policy or activity is not a pretext for discrimination.	In accordance with EO 12898 and the DOT Order on EJ, if a DOT program, policy, or activity will have a disproportionately high and adverse effect on minority or low-income populations, that program, policy, or activity may only be carried out if further mitigation measures or alternatives that would reduce the disproportionately high and adverse effects are not practicable. In determining whether a mitigation measure or an alternative is “practicable,” the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account.
<b>Does the authority create any rights or remedies?</b>	Title VI allows persons alleging discrimination based on race, color, or national origin by recipients of Federal funds to file administrative complaints with the Federal departments and agencies that provide financial assistance. Persons alleging intentional discrimination (i.e., disparate treatment) may bring a court action seeking to enforce Title VI but cannot do so with regard to allegations of discrimination based on agency disparate impact regulations. Disparate impact claims may be filed with the Federal agency.	EO 12898 establishes the Executive Branch policy on environmental justice . . . .

<sup>23</sup> Table 1 is from Federal Transit Administration, U.S. Department of Transportation, *Circular FTA C 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients* 4-5 (Aug. 15, 2012).

**Table 2: Environmental and Health Justice Analysis Executive Order 12898**

<b>Executive Order 12898 on Environmental and Justice.<sup>24</sup> See draft Study at 3.13.3.</b>	<b>NRC Health Impact Assessment (HIA): 1. screening, 2. scoping, 3. assessment, 4. recommendations, 5. reporting, 6. monitoring and evaluation<sup>25</sup></b>
1. Identify disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority populations and low-income populations	1. Screening 2. Scoping 3. Assessment 5. Reporting
2. Avoid, minimize, and mitigate such effects through mitigation measures or alternatives	3. Assessment 4. Recommendations 5. Reporting 6. Monitoring and evaluation
3. Prevent denial of, reduction in, or significant delay in receipt of benefits by minority and low-income populations	3. Assessment 4. Recommendations 5. Reporting 6. Monitoring and evaluation
4. Social, economic (including costs), and environmental effects taken into account	3. Assessment 6. Monitoring and evaluation
5. Ensure full and fair participation by potentially affected communities	1. Screening 2. Scoping 3. Assessment 6. Monitoring and evaluation

<sup>24</sup> See, e.g., FTA, *Environmental Justice Policy Guidance for Federal Transit Administration Recipients*, Circular, FTA C 4703.1 at 12, 42 (Aug. 15, 2012). *Accord, Coliseum Square Assoc., Inc. v. Jackson*, 465 F.3d 215, 232 (5th Cir. 2006) (12898 instructs agencies to consider the environmental justice impacts of their actions; agency's consideration of environmental justice issues reviewed under Administration Procedures Act).

<sup>25</sup> National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), HIA framework chart at page 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.

**Table 3: Compliance, equity, and environmental and health justice framework**

Compliance or equity review FTA <sup>26</sup>	NRC Health Impact Assessment <sup>27</sup>
1. A clear description of what the agency plans to do	1. Screening 2. Scoping 5. Reporting
2. Analyze the burdens and benefits for all populations, including minority and low income populations	3. Assessment
3. Analyze alternatives	2. Scoping 4. Recommendations
4. Full and fair inclusion of minority and low-income populations in the decision-making process	1. Screening 2. Scoping 3. Assessment 6. Monitoring and evaluation
5. Implementation plan to address any equity concerns identified in the process	5. Reporting 6. Monitoring and evaluation

<sup>26</sup> See, e.g., *Environmental Justice Policy Guidance for Federal Transit Administration Recipients*, Circular, FTA C 4703.1 and pages 12, 42 (Aug. 15, 2012); FTA, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, Circular, FTA C 4702.1B (Oct. 1, 2012); Letters from Peter M. Rogoff, Administrator, FTA, U.S. Department of Transportation, to Metropolitan Transportation Commission and San Francisco Bay Area Rapid Transit District (Jan. 15, 2010 and Feb. 12, 2010), available at [www.cityprojectca.org/blog/archives/4468](http://www.cityprojectca.org/blog/archives/4468). See also 42 C.F.R. §§ 42.406, 42.407 (DOJ Title VI coordination regulations require data collection to permit effective enforcement of Title VI and compliance review).

<sup>27</sup> National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), HIA framework chart at page 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.

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**Table 4: Disparate Impact Analysis Title VI Regulations**

<b>Disparate Impact Analysis<sup>28</sup></b>	<b>NRC Health Impact Assessment<sup>29</sup></b>
1. Whether a program or activity has an adverse and disproportionate numerical impact based on race, color, or national origin. This can be shown through statistical studies or anecdotally.	1. Screening 2. Scoping 3. Assessment 5. Reporting
2. Are the disparities justified by business necessity	3. Assessment 4. Recommendations 5. Reporting 6. Monitoring and evaluation
3. Are there less discriminatory alternatives to accomplish these interests	3. Assessment 4. Recommendations 5. Reporting 6. Monitoring and evaluation

<sup>28</sup> The HUD regulations described above use this disparate impact analysis. 24 C.F.R. § 100.500. *See also* federal disparate impact regulations, 43 C.F.R. § 17.1 *et seq.* (Department of Interior Title VI regulations); 40 C.F.R. § 7.1 *et seq.* (EPA Title VI regulations).

<sup>29</sup> National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), HIA framework chart at page 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.



**Table 5: Intentional Discrimination Analysis Title VI Statute**

<b>Intentional Discrimination Analysis<sup>30</sup></b>	<b>NRC Health Impact Assessment<sup>31</sup></b>
1. Whether there are adverse, numerical disparities based on race, color, or national origin	1. Screening 2. Scoping 3. Assessment 5. Reporting
2. Whether there is a history of discrimination	1. Screening 2. Scoping 3. Assessment 5. Reporting
3. Whether the program or activity meets substantive standards	3. Assessment 4. Recommendations 5. Reporting
4. Whether the program or activity meets procedural standards	3. Assessment 4. Recommendations 5. Reporting
5. The decision maker's knowledge of the impact of the program or activity	3. Assessment 4. Recommendations 5. Reporting 6. Monitoring and evaluation
6. Whether there is a pattern or practice of discrimination	1. Screening 2. Scoping 3. Assessment 5. Reporting 6. Monitoring and evaluation

<sup>30</sup> See, e.g., Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d - 2000d-4a; *Village of Arlington Heights v. Metro. Housing Dev. Corp.*, 429 U.S. 252, 265-70 (1977).

<sup>31</sup> National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), HIA framework chart at page 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.

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**Table 6: NRC Health Impact Assessment**

<b>NRC Health Impact Assessment<sup>32</sup></b>	
1. Screening	
2. Scoping	
3. Assessment	
4. Recommendations	
5. Reporting	
6. Monitoring and evaluation	

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<sup>32</sup> National Research Council (NRC), *Improving Health in the United States: The Role of Health Impact Assessment (HIA)* (2011), HIA framework chart at page 7, 6-9; logic framework of causal pathways at 54; systematic scoping table at 55; health effects matrix at 63; rating health effects at 64.

November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District;  
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ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, California 90053-2325

Via Email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Regarding: Los Angeles River Ecosystem Restoration Integrated Feasibility Report

Dear Dr. Axt,

On behalf of the California Chapter of The Nature Conservancy, thank you for the opportunity to comment on the Los Angeles River Ecosystem Restoration Integrated Feasibility Report: Feasibility Study and Environmental Impact Statement/Environmental Impact Report.

The Nature Conservancy (Conservancy) is an international non-profit organization dedicated to conserving the lands and waters on which all life depends. Our on-the-ground work is carried out in all 50 states and in 34 foreign countries and is supported by approximately one million members. To date, we have helped conserve more than 117 million acres (including 1.2 million acres in California) and 5,000 river miles around the world. We have been engaged in the protection and management of natural resources across the U.S. for many years. In fact, we sponsor more projects with the US Army Corps of Engineers than any other non-profit organization.

The foundation of the Conservancy's work is our commitment to using the most up-to-date conservation science information and methodologies to guide decision-making. Our tools and methods have been widely adopted by other organizations and agencies that engage in ecosystem restoration. As a science-based organization with on-the-ground experience, the Conservancy carefully reviewed the "Area with Restoration Benefits and Opportunities for Revitalization" (ARBOR) Study. Our comments are focused on the habitat restoration, biological diversity, wildlife, and ecological benefits covered in the Study.

ARBOR arrives at a time when the global significance of the mediterranean biome is well-recognized. Mediterranean-climate regions have high levels of species richness and endemism and are found in only five places on Earth: the Mediterranean Basin, the western cape of South Africa, southwestern Australia, the central coast of Chile, and California and northern Baja California. While mediterranean-climate regions cover only 2.2 percent of Earth's land surface, they contain 20 percent of all known plant species. Unfortunately, mediterranean ecosystems are also among the most threatened on Earth. Because they are characterized by hot, dry summers and mild, wet winters, mediterranean-climate regions are attractive places for human settlement. Many have been heavily urbanized and now face grave problems such as habitat destruction, degradation, and fragmentation. More than 41 percent of the mediterranean biome has been converted to farmland and urban uses, and only 5 percent of its natural area has been protected.

In Greater Los Angeles, the valleys have been developed for residential, commercial and industrial use and many natural riparian corridors have been channelized. However, we found in our 2013 Assessment of the region's biological diversity, important ecological values remain as do opportunities for ecological restoration that will benefit nature and people. This science-based assessment demonstrated that the areas of greatest restoration potential are the region's riparian corridors, the foothills, and water retention/flood control basins, including the soft-bottom portion of the Los Angeles River.

Restoration of the Los Angeles River will be of particularly high value, because its flows are vital to the region's hydrological and groundwater health and to the riparian plant communities along its course. These riparian plant communities are, in turn, essential to the existence of many of the region's distinctive species of birds, mammals, reptiles, amphibians, insects, spiders and other invertebrates. As the Study notes, the Los Angeles River was once populated with native fish and amphibians. Songbirds, seabirds, and water fowl found nesting sites and food sources there, and many animals large and small used the channel and riparian zone as a natural corridor for movement. Restoring the Los Angeles River will be a necessary component of the restoration of nature and of nature's benefits to people in the nation's second largest metropolitan area. Its restoration is also a matter of global significance due to the scarcity of mediterranean riparian habitat.

In closing, the Conservancy supports the extensive habitat restoration envisioned in ARBOR, including the proposal to restore the 11-mile soft-bottom portion of the Los Angeles River, Valley Foothill Riparian Strand, and Freshwater Marsh Habitat. The restoration of habitat and wildlife linkages will reconnect habitats along the river and throughout the region, which would leader to broader biodiversity gains. As stated in the attached Appendix, it is essential that plants and both invertebrate and vertebrate wildlife species, such as insects, fish, amphibians, reptiles, birds, and mammals, be included in the ecosystem restoration plan. While each of the alternatives (10, 13, 16, and 20) detailed in the Study offers restoration benefits, our evaluation indicates that Alternative 20 will provide the greater biological diversity and ecosystem function restoration benefits.

We commend the U.S. Army Corps of Engineers and the City of Los Angeles on this comprehensive study of the Los Angeles River's ecosystem restoration potential. Thank you again for the opportunity to provide comments on the Los Angeles River Ecosystem Restoration Integrated Feasibility Report. Please direct questions to Shona Ganguly, External Affairs Manager, at [sganguly@tnc.org](mailto:sganguly@tnc.org) or please call 213-327-0104 extension 14207.

Sincerely,



Alfredo Gonzalez  
Regional Director, South Coast & Deserts  
The Nature Conservancy

## Addendum to The Nature Conservancy's Comments on the Army Corps of Engineers' Los Angeles River Ecosystem Restoration Integrated Feasibility Report

### Appendix A: Scope, Geography, and Restoration

Geography The Report appropriately focuses on the approximately 11-mile long reach of the River, which extends from the US Army Corps of Engineers Headgate to First Street. The entire River is 51 miles long and the original study area encompassed a 32 mile stretch from the confluence of Bell and Calabasas Creeks at Owensmouth Boulevard in the northwestern San Fernando Valley to Washington Street near the border between the City of Los Angeles and Vernon. The ARBOR selected reach has the River's longest sections of soft bottom and connections to important tributaries and two relatively large riverside properties that could be restored to function as floodplain and wildlife habitat (Taylor Yard and Piggyback Yard). Other areas within the watershed that deserve greater attention include the Sepulveda Basin and the linkage between the northern Verdugo Hills and Big Tujunga Creek (from approximately Green Verdugo Reservoir to the Angeles National Golf Club). While these stretches require consideration in a distinct project, they are integrally important to the restoration of an ecologically functional Los Angeles River.

Scope The Project's stated planning objectives are appropriately directed towards habitat protection and restoration plus increased connectivity with large, core habitat areas nearby, all of which will protect and restore biological diversity. The stated objectives are (see ES.5 on page xxiii):

1. Restore Valley Foothill Riparian Strand and Freshwater March Habitat: Restore Valley Foothill Riparian wildlife habitat types, aquatic freshwater marsh communities, and native fish habitat within the ARBOR reach throughout the period of analysis, including restoration of supporting ecological processes and biological diversity, and a more natural hydrologic and hydraulic regime that reconnects the river to historic floodplains and tributaries, reduces velocities, increases infiltration and improves natural sediment processes
2. Increase Habitat Connectivity: Increase habitat connectivity between the river and the historic floodplain and increase nodal connectivity for wildlife between restored habitat patches and nearby significant ecological zones such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills and San Gabriel Mountains within the ARBOR reach throughout the period of analysis.
3. Increase passive recreation: include recreation that is compatible with the restored environment in the ARBOR reach throughout the period of analysis.

Objectives 1 and 2 will directly contribute to protection and restoration of biological diversity. The portion of Objective 1 dedicated to restoration of a more natural hydrologic and hydraulic regime will also contribute to flood risk management. For nearly a century, the primary objective of Army Corps of Engineers projects was flood risk management through channelization and hard barriers. The Corps has expanded its means to reaching these hydrologic and hydraulic objectives in the four alternatives featured in the Report that will also restore processes and features that directly contribute to and in some cases are necessary for the restoration of viable populations of some native species. Those methods also provide "green infrastructure" benefits for people.

More specific information about the benefits sought, and especially about the benefits expected from different actions, are missing from this Report and would be helpful, perhaps crucially so, in guiding decisions about which alternative to pursue. There is little evidence in the Report that any of the alternatives discussed would be sufficient to restore viable populations of native fish to the Los Angeles River. We recommend that either



information on additional steps that would be necessary to accomplish this be added to the Report along with a brief analysis of the cost and practical possibilities of this occurring OR that this objective be dropped.

Moreover, there is very little specific information on restoring habitat for migratory and resident birds was included in the Report. The ARBOR section of the Los Angeles River already harbors impressive numbers of waterfowl (mostly migratory) and some birds that nest, shelter and forage in riparian vegetation, particularly during certain periods of the year. The actions selected and taken could be more beneficial and cost-effective (efficient) if guided by clearer analysis of which species were most likely to benefit, and how habitats and other resources most suited and important to them could be restored. For example, some species of wading birds, ducks, geese and other waterfowl are favored by certain water depths and by certain substrates (e.g. fine muds v. sands), and a focus on enhancement or restoration of these features could make a significant difference in whether the project actually attracts targeted species and how many individuals the restored section of the River then supports or hosts during migratory visits. Because birds attract interest and attention not only from serious birdwatchers but from many more people with interest in the world around them, efforts that bring significant numbers of birds, especially species less familiar than the pigeons, crows and English sparrows common in urban environments, could garner far greater public interest and support for this project and other conservation work.

4

Restoration & Biodiversity Protection Alternative 20 (RIVER) makes the most provisions for biodiversity protection and restoration compared to Alternatives 10, 13, and 16, particularly because of the additional connections it would provide to nearby core protected areas, and the direct links it would make with re-created wetland/floodplain habitat in the Piggyback Yards and the Los Angeles State Historic Park (Cornfields). Alternative 20 also provides the highest number of habitat units restored and the highest number and quality of ecosystem connections re-established—the factors most closely aligned with the protection and maintenance of biological diversity and ecosystem functions. Importantly, Alternative 20 includes restoration of the Verdugo Wash confluence and the Cornfields site, in addition to reaches 1-7 (connecting Pollywog Park, Bette Davis Park, Ferraro Fields, Upstream Glendale Narrows, Los Feliz, Bowtie Parcel, Downstream Glendale Narrows/Arroyo Seco, Main Street, and First Street).

The re-created wetland/floodplain area of the Piggyback Yards and the Cornfields site will provide new riparian habitat and significant flood risk reduction via green infrastructure. It will also provide significant flood risk reduction via green infrastructure (i.e. the use of natural systems such as restored flood plain capable of supporting healthy native vegetation, rather than artificial, hardscape solutions). Restoration of these two sites will also bring nature into areas of Greater Los Angeles now particularly lacking in open space and native habitats.

1

Alternative 20 includes actions designed to link habitats along the Los Angeles River to the Santa Monica Mountains and San Gabriel Mountains and to restore floodplain habitat (and floodplain function) to the Taylor Yard, as does Alternative 13. However, Alternative 20 alone includes actions to link Verdugo Wash and the Verdugo Hills (through restoration around the confluence of the Los Angeles River and Verdugo Wash). In Alternatives 13, 16 & 20 connection to the San Gabriel Mountains would be made through restoration around the confluence of the Los Angeles River and Arroyo Seco which flows from the San Gabriel Mountains north of Pasadena and Altadena. However, the Los Angeles River – Arroyo Seco confluence is in a very highly developed, busy location, surrounded by major roads and rail lines and may remain difficult to reach for many animals. In Alternative 20, a second connection to the San Gabriel Mountains through the Verdugo Hills will be started, but additional work to connect the northern Verdugo Hills with the San Gabriel Range through Big Tujunga Creek will probably be necessary for this corridor to function for most terrestrial animals (many bird

species, some flying insects and some plants with good long-distance fruit/seed dispersal mechanisms may be able to cross the gap that now exists there). Likewise, while Alternative 13 would restore habitat to the Piggyback Yards only Alternatives 16 and 20 would eliminate the physical barrier between the Los Angeles River and the Piggyback Yards and thereby allow the Piggyback Yards area to function as floodplain and reduce flood risk.

We recommend that more information is provided on the habitat and biological diversity values in any of the areas the project Alternatives would link with (Santa Monica Mountains, San Gabriel Mountains, Elysian Hills, Verdugo Hills, etc.) in the final version of the Study. For example, although the Santa Monica Mountains are highly fragmented by residential and other urban developments, they still contain habitat and biodiversity values. The Verdugo Hills contain roughly 14 square miles of habitat including park lands totaling 4,000 acres owned and protected by the City of Burbank, City of Glendale, City of Los Angeles, California Department of Parks and Recreation (Verdugo Mountains State Park) and the Santa Monica Mountains Conservancy. Geologically a part of the Transverse Ranges, the Verdugos (sometimes called Verdugo Hills, sometimes Vedugo Mountains) are relatively low and largely covered with chaparral vegetation on slopes and more mesic canyon and riparian woodlands in canyons and along waterways. The San Gabriel Ranges to the north reach much greater elevations (over 10,000 feet) and host a wider variety of vegetation types ranging from coastal sage scrub in the lowlands to montane coniferous forests and meadows along the crest of the range and descending to Joshua Tree woodland and creosote scrub on the drier, inland side. The San Gabriel Range is part of a sprawling network of protected habitat of continental and global significance, connected with the San Bernardino and Peninsular Ranges to the east and south, the Santa Susana Range to the west and the Tehachapi Range to the north/northeast which in turn link to the Sierra Nevada. It supports a National Forest – parts of which would become part of a new National Recreation Area under a proposal now being given serious consideration – as well as state and local park and preserve lands. The San Gabriels host a wide variety of animals, including black bears, puma and many other mammals, reptiles, amphibians, fish, and birds. It would be particularly useful to know more about whether there are any species endemic to the region, or whose numbers are suspected of having dramatically decreased as a result not only of the destruction of habitat in the region, but of the severing of links between the various ranges (Santa Monicas, Verdugos, San Gabriel Mountains) that still harbor large areas of habitat.

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## Appendix B: Water Resources/Hydrology

Water Resources Sections 3.5 and 5.4 of the Report recount the fact that the river is in a relatively polluted state in an urban area, mostly supplied by sewage treatment plant outflows in dry weather, engorged by precipitation in rain events because few open areas are left to absorb the water.

Hydrology and Hydraulics The opening sections of the Report (page 1) state the purpose of the study and reflect the U.S. Army Corps of Engineers' core mission of flood risk.

6

*It is important to note up front that the primary premise from the hydrology and hydraulics perspective is that any ecosystem project evaluated in this study must not negatively impact the flood risk management function of the system. This means any effort to alter the existing Los Angeles River channel must provide mitigation to offset any loss of conveyance.*

The premise is in conflict with the presence of vegetation in the river channel, which slows flow, raises water levels, and presents increased risks of flooding where the channel's concrete channel and levees are not adequate. The Report notes that several segments within the 11-mile reach considered for improvement are

currently not adequate to contain 100-year floods.<sup>1</sup> The channel construction, according to the Report, was based on originally defective design criteria (page 38-39).

The Report then identifies four selected alternatives that were analyzed compared to the Existing Conditions to determine their impacts on the flood control function of the channel. Two factors to evaluate the effects of alternatives:

*One of the critical constraints for this ecosystem restoration study was that the proposed alternatives would have no impact on the flood control functions of the Los Angeles River Channel. In addition to the impacts on flood control, it is imperative the proposed alternatives do not create any adverse conditions related to high velocities. Since the proposed alternatives are quite elaborate and extensive, the COE needed an efficient process for determining impacts and feasibility for each of the proposed alternatives. To evaluate the hydraulic Impacts, it was decided to base the impacts on two factors; the change in maximum water surface elevation and the maximum velocity. (page 31)*

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The Report evaluates maximum velocities for maintenance of vegetation and sets standards for soft bottomed, unlined sections of the river. In all of the Reaches covered by the Study, and for all of the Alternatives, velocities are typically greater than 8 feet per second. Because the original design of the channel was undersized (and FEMA has not recognized that fact), and because vegetation elevates flooding risk by restricting the velocity of flow, we have some concern that restoration efforts that increase the amount of vegetation in the river channel may be resisted despite the Corps' finding that "any of the four alternatives can work hydraulically given the constraint on maintaining vegetation to acceptable limits" (page 42). We would like additional clarification on whether any additional armoring will be requested downstream to compensate for increases in vegetation, and whether the Corps will retain the prerogative to remove vegetation that it considers interfering with swift flows during flooding events. This clarification could also help catalyze restoration efforts by nongovernmental organizations inclined to assist with Los Angeles River restoration and counter the idea that the need to manage flood risk will inadvertently or eventually undo their efforts.

#### Appendix C: Additional Recommendations (Geology, Seismology, Soils, Minerals, and Wildlife)

**Study Area** The heavily vegetated portion of the river continues past the Glendale Freeway (SR-2) all the way to the Golden State Freeway (Interstate 5), whereas in Section 3.5 on page 3-33, lines 10-12, the Report erroneously states, "*The River is mostly confined to a concrete-lined channel surrounded by urbanized areas and much of it is virtually devoid of any natural vegetation. Exceptions include Reaches 4-6 in the study area, roughly from Brazil Street to the Glendale Freeway.*" The 2.34 mile reach of the river between the SR-2 and I-5 is described in the study as Reach 6 on page 2-13, where it is stated, "*Sediment deposited in the channel has formed sand bars/islands, which have become stabilized as the root systems of the many trees and other vegetation have trapped sediment.*" Also, page 3-35 lines 3-4 state: "*Riparian communities continue south throughout the reaches and stop just upstream of the I-5 overpass, where the channel bed becomes concrete once again.*" Finally, it should be noted that there is also vegetation in Reach 2, and while the study states on page 2-9 lines 1-2 that Reach 2 "is not as densely vegetated as areas farther downstream in Reaches 4 to 6", it nonetheless contains some vegetation—"Sediment deposited in the channel has formed sand bars/islands,

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<sup>1</sup> On page 15 of Appendix E, the Report notes: It is important to note there are several locations within the ARBOR reach where the probability of flows breaking out from the channel within the ecosystem project area is greater than 1% in any given year (equivalent to the 100-yr flood), i.e., the channel has less than 100-yr level of protection in some locations.

which have stabilized as the root systems of the many trees and other vegetation in the channel have trapped sediment over time” (page 2-8, lines 10-11). Therefore mischaracterization of this section of the river as “virtually devoid of any natural vegetation” should be corrected.

7

Nomenclature/Categorization In Section 3.1 on page 3-7, Figure 3-3, the San Rafael Hills are mislabeled as the Repetto Hills. The Repetto Hills are separate and distinct and located to the south and southeast of the San Rafael Hills.

8

In response to the section on perennial grasslands, if the dominant species are not perennial, this habitat type would be better categorized as “Annual Grassland”, “Invasive Annual Grassland”, “Non-native Annual Grassland”, or even “California Grassland”. On page 3-33, lines 40-42, the Report describes, “*Perennial Grassland Dominant species include introduced annual grasses such as wild oats, bromes, and fescues. Non-native forbs including filaree and clovers may be present. Native species may also be present.*”

9

A question about the differences between the “Low Density Urban” and “Pasture Agricultural” categories arises from page 3-34, lines 8-9: “*Low Density Urban This is composed of urban uses such as parks, recreational fields, golf courses, and other such urban open space areas.*” Given that this category undoubtedly has significant portions of it covered by grass, clarification is needed about difference between this category and “Pasture Agricultural” category listed above on page 3-33 line 38 and if it is based on a management difference.

10

Vegetation & Invasive Species The justification that there are limited funds to maintain vegetation in the channel and therefore the invasive species should be removed seems to be at the crux of the whole restoration debate for the Los Angeles River. On page 3-34, lines 11-16, the Report explains, “*Vegetation within the River channel can inhibit the channel’s capacity to convey floodwaters. The channel is designed to be maintained free of vegetation to avoid impacts to flood conveyance and channel structures. However, lack of funds for maintenance has resulted in substantial vegetation growing within the channel. Due to limited funds available to maintain vegetation in the channel, USACE has focused on removing non-native vegetation using both herbicide and mechanical means. Non-native plants often out-compete natives, degrading the ecological vitality and productivity of native habitats.*”

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It is difficult to recommend restoration best practices without knowing how management is currently influencing the habitat present. More information about when and exactly what the Corps has done recently with regard to “occasional mechanical removal” of riparian habitat for this reach and the rest of the river would be helpful. The Report alludes to non-native removal efforts and “mechanical removal,” but does not elaborate as seen on page 3-34, lines 25-26: “*Several small patches of riparian habitat are located within the River channel and are subject to occasional mechanical removal by the USACE, with most recent efforts focused on non-native removal.*” and lines 38-39: “*Vegetation growth at Verdugo Wash has become a concern for inhibiting water flow and all vegetation is periodically mechanically removed in Reach 3.*”

There is also limited quantitative data in the Report on species, vegetation, and degradation in these reaches, particularly on page 3-34, line 30: “*Staging areas between Forest Lawn Drive and Zoo Drive are bordered by perennial invasive grasses*” and on page 3-34, line 44: “*overall, vegetation is limited and degraded in these reaches.*” Information is also needed on the “weedy species” as well as quantitative measurement of cover that is mentioned on page 3-35, line 21-23: “*Any vegetation within the main River channel is composed of weedy species that have become rooted in the cracks of the channel walls or hummocks of vegetation that grow on the minimal accumulated sediment and wash out with high flows.*”

12

Wildlife Species The sections on the species along the Los Angeles River need elaboration, clarification, and more research. The bat species need to be specifically named, rather than the allusion on page 3-39, line 6-7: “and several species of bats (CDFW 1993).” (The CDFW study is not easily available online, which makes verification difficult.) Also, only the common urban species of birds are listed (page 3-39, lines 9-22). There are many species of birds that have been sighted at the Los Angeles River and recorded at the CNDDDB and ebird that are not listed here, nor is there an accounting here of the total number of birds that have been seen along the river, despite the fact that this should be in the hundreds. Also, the work of the foremost bird expert in Los Angeles (Kimball Garrett) should be cited in this section. More waterfowl and shorebirds should be listed as well. We recommend that the section include additional and more thorough information and references.

The section on “Special Status Species” (page 3-40, line 14) should include information about special status natural communities. In addition, special status species should include all 898 taxa of Special Animals and all fully-protected animals as defined by the California Department of Fish and Wildlife:

<http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/spanimals.pdf>,

[http://www.dfg.ca.gov/wildlife/nongame/t\\_e\\_spp/fully\\_pro.html](http://www.dfg.ca.gov/wildlife/nongame/t_e_spp/fully_pro.html)

If these were to be considered as “Special Status Species” by this study (as they should be), then the list of special status species detected within the study area on the river grows longer to include:

- Willow Flycatcher
- White-tailed Kite
- Yellow Warbler, and a number of other species

We disagree with the language in the statement that indicates that “only three bird species have the potential to occur in the project area” as stated on page 3-40, lines 29-33: “*There are a total of 28 special status wildlife species with the potential to occur in the greater Los Angeles Basin (Appendix G). However, of these, only three bird species have the potential to occur in the project area, including high potential for least Bell’s vireo (Vireo bellii pusillus), and low potential for both the southwestern willow flycatcher (Empidonax trailliiextimus) and coastal California gnatcatcher (Polioptila californica).*” It is highly likely that there are other species that have this potential, particularly if the river and its habitats were to be enhanced through restoration. It also suggests that these areas have been thoroughly surveyed, which may or may not be the case. A more accurate statement would be: “However, of these special status species, only one has been recorded within the project area in recent years—the Least Bell’s Vireo.” Furthermore, in reference to page 3-40, the common names of bird species should be capitalized. This is the preferred format, and it avoids confusion when using common names (reference <http://www.worldbirdnames.org/rules-caps.html>).

The Report makes assumptions about certain species not occurring within the study area, when there is documentation to the contrary. For example, Willow Flycatcher occurrences within the study area have been documented in ebird, even though the Report states on page 3-40, lines 41-43 that “*the most recent documented occurrence of the southwestern willow flycatcher was over 13 miles west of the project area in the Angeles National Forest.*” Also, while the California gnatcatcher may not nest in the acre of Coastal Scrub habitat found within the study area, this acre is close to known gnatcatcher habitat in the Santa Monica Mountains. On page 3-40, lines 43-44, the Report states, “*The gnatcatcher, which generally occupies coastal scrub habitat, is unlikely to occur since there is less than 1 acre of this habitat type in the corridor.*” However, there is a record in ebird for California gnatcatcher from this spring (2013) in the bird sanctuary in Griffith Park, and individuals may intermittently use the remnant fragments of scrub habitat along the river.



The following statement from page 3-42, lines 12-16 about the blockage of wildlife passage is overly broad and requires citation and justification: “*The combination of the River channel and the adjacent highways and development has effectively created a blockage to the wildlife movement that would have historically occurred between the Santa Monica Mountains to the west and Verdugo Mountains and San Gabriel Mountains to the east. Additional development further blocks wildlife passage between the Verdugo Mountains and the much larger Angeles National Forest.*” Our concern here reflects our desire for better understanding of wildlife movement in Los Angeles. In absence of a study done to quantify movement of wildlife through these areas, we do not know which species are restricted in their movements and which species may be moving through the urban environments to get to larger patches of habitat. These movements are very species-specific, and generalizations like the statement above could inadvertently add to the mistaken belief that “there is no nature in Los Angeles,” a notion this report endeavors to dispel.

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The central concern that emerged from a review of Section 4.9 is the exclusion of invertebrate species and plants from the species that were evaluated. On page 4-30, lines 21-22, the Reports describes, “*Over 175 species were evaluated in CHAP for the LA River Ecosystem Restoration Study including fish, amphibians, reptiles, birds, and mammals.*” Also, only 35 of the 175 species were not birds. The main issues with this focus is that many of the species that carry out ecological functions are not vertebrates – and these “key Ecological Functions” are part of the CHAP methodology. It is also curious that many of the bird species evaluated in the CHAP were not mentioned in the section on wildlife, despite the fact that they have been recorded (on e-bird) within the study area on the river. These include:

- Hooded Oriole
- Bullock’s Oriole
- Lazuli Bunting
- Blue Grosbeak
- Western Tanager
- several species of woodpeckers and owls
- Cinnamon Teal
- Ring-necked Duck
- Northern Pintail
- Sharp-shinned Hawk
- Osprey
- Great Blue Heron
- Spotted Sandpiper
- Black Necked Stilt

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From a review of Section 5.5, Alternative 20 is the most beneficial for wildlife, because there is a significant increase in areas targeted for restoration compared to the other alternatives. This increased target area renders it the most expansive and transformative restoration alternative with 288 acres of valley foothill riparian habitat restoration, 46 acres of freshwater marsh creation, and open water habitat creation (from the expansion of the soft river bottom to its maximum potential along Reaches 5, 6, and 8) (page 5-55, line 35-38).

1

November 18, 2013

Josephine R. Axt  
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ATTN: Ms. Erin Jones, CESPL-PD-RN

SUBJECT: COMMENTS ON THE LOS ANGELES RIVER ECOSYSTEM  
 RESTORATION FESIBILITY REPORT AND EINVRONMENTAL IMPACT  
 STATEMENT/ENVIRONMENTAL IMPACT REPORT

**The RIVER  
 PROJECT**

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The River Project submits some rather informal comments for your consideration:

The study does not consider climate change or its impacts at all. In 2013 - with what we've seen, with what we know, with the recent Presidential Executive Order – that's inexcusable. 1

The study does not consider flood risk management. Los Angeles is a national priority watershed – one of the top 10% most at risk of NOT achieving the Corps 100-year "vision" according to the Corps' own National Watershed Vision report. 2

The study does not consider upstream inputs as they are bound to change over time, despite the fact that they are now in the process of changing and - given City recent commitment to capture and infiltrate local rainfall to the maximum extent practicable - will certainly continue to change over time. This despite Corps guidance that "Restoration projects should be conceived in a systems context ... in order to improve the potential for long- term survival as self-regulating, functioning systems. This system view will be applied both in examination of the problems and the development of alternative means for their solution. Consideration should be given to the interconnectedness and dynamics of natural systems..." and despite the directive following the 1996 LACDA lawsuit that the Corps and County should take a watershed approach in the region. 3

The study does not consider local water resources. Nor does the study consider the inherent conflict between continuing to operate the LACDA Project as it was designed and responsibly stewarding Los Angeles' local water resources. Recognizing and reconciling these two issues are of paramount importance to achieving a climate adaptive Los Angeles. 4

Widening the channel is indeed critical to restoring ecosystem function as well as to protecting local water resources and achieving a higher measure of public safety. Appropriate study of this approach was hampered by the study's narrow scope. 5

The notion that the habitat created by the proposed project will suffer from reduced flows seems to demonstrate a lack of understanding of the needs of our native habitats. The Corps' cavalier attitude toward valuable ecosystems in the Los Angeles region has been repeatedly demonstrated, most recently in the Sepulveda Basin. There is no reason to believe that attitude 6

will change. Given the City's historic budgeting for parks and their track record at Bull Creek and their own Studio City Greenway, leaving maintenance of the project in their hands is not, at this point in the City's understanding of ecosystems and their value, provide any higher measure of comfort.

While significant effort went into the development of the study, the project was doomed from the beginning by the narrowly constrained scope.

As a result, what we have is an economic development plan with some native landscaping, wherein some concrete gets moved around but no meaningful ecosystem (much less hydrologic) function is derived. It appears that nearly half the jobs "created" and several times as much of the "labor income" comes from redevelopment as from restoration.

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On the plus side, there are some lovely renderings that have been used to great effect to build a wider constituency for a restored river, for which we are thankful.

However, investing \$1B in federal and local funds in a project that through its limited scope is, in essence, an economic development plan that seeks to locate new development in areas that are and will remain at risk in a 100-year storm (not to mention a larger event) is mad.

A comparable investment that fully considered the river in a watershed context and explored its role in addressing Los Angeles' climate change challenges would be much more prudently spent.

The logical thing to do is to set this study aside, and begin a dialogue about whether or not the Army Corps is relevant on the Los Angeles River in this era of climate uncertainty. As long as they are charged with maintaining the system that they built in the 20<sup>th</sup> century – a system designed to throw our local water resources away as fast as possible, a system that will by its very nature always have a negative impact on local water quality and habitat – we cannot sincerely maintain that they do. Our challenge is to better balance the need for public safety with the need for local water resources and to do it through an integrated approach to achieve the greatest number of benefits for the citizens of Los Angeles.

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WRRDA provides a means to decommission the Corps' responsibility on projects where they are no longer relevant. A move to do so in Los Angeles would take careful thought as to where the responsibilities would shift and thoughtful planning about a different role for the river in our city, but it seems the wisest decision we could possible make.



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October 25, 2013

Lieutenant General Thomas P. Bostick  
Commanding General and Chief of Engineers  
United States Army Corps of Engineers  
2600 Army Pentagon, Room 2E667  
Washington, DC 20310-2600

Dear Lieutenant General Bostick:

On behalf of The Trust for Public Land, a national organization dedicated to conserving land for people, we are pleased to offer enthusiastic support for Alternative 20 (RIVER), in the USACE study of the Los Angeles River. We join Mayor Eric Garcetti, the Los Angeles City Council, and many of our partners and colleagues in Los Angeles in backing this expansive vision.

The Trust for Public Land was established in 1972 with goals of protecting land in and around cities, and pioneering new land conservation techniques. With offices now in 30 states, we have preserved more than 3 million acres of land for people to enjoy as parks, gardens, and other natural places, ensuring livable communities for generations to come.

To emphasize our support of Alternative 20 we have drafted the enclosed review, which outlines some of our work on urban river projects nationwide. Our experience testifies to the value of wide-ranging river restoration, and the multiple benefits of these projects on community and habitat health, water quality, and economic development.

We understand the important precedent promised by the ARBOR study, and applaud this grand effort to carefully consider and understand the possibilities for restoring the ecosystems of our beloved LA River. Thank you for this opportunity to share our thoughts.

Regards,

Roger Hoesterey  
Vice President and Western Division Director

Jodi Delaney  
Los Angeles Program Director

cc:

Hon. Eric Garcetti, Mayor of Los Angeles  
Col. Kimberly Colloton, USACE SPL Commander  
Dr. Josephine Axt, USACE SPL Chief of Planning  
Gary Lee Moore, City Engineer



REVIEW AND COMMENT OF

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# LOS ANGELES RIVER—ARBOR STUDY



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THE TRUST *for* PUBLIC LAND

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CONSERVING LAND FOR PEOPLE



## ABOUT US

The Trust for Public Land (TPL) is a national organization dedicated to conserving land for people to enjoy as parks, gardens, and other natural places, ensuring livable communities for generations to come.

We were established 1972 with goals of protecting land in and around cities and pioneering new land conservation techniques. Working from more than 30 offices around the country, The Trust for Public Land has completed more than 5,400 park and conservation projects nationwide, protecting more than 3.2 million acres valued at \$7.4 billion in 47 states, Washington, DC, Puerto Rico and the US Virgin Islands. Forty years of success has made us a national leader and innovator in city park creation, state and local conservation funding and the use of GIS mapping and proprietary “greenprinting” techniques for conservation planning.

Our participatory design process engages local stakeholders to ensure that each newly developed site meets the needs of the community it serves. In fact, we provide a uniquely expert portal to local communities that brings experience with multi-million dollar fundraising efforts, complex negotiations and transactions, and land conveyances to local, state, and federal units of government directly to the people we serve.

The mission of our Parks for People Program is to ensure that all people—in particular, all children— are within a ten-minute walk of a park, playground, or natural area. To date, we have renovated, developed and preserved more than 300 parks and 100 community gardens in dozens of cities across the country.

## THE LOS ANGELES RIVER: 76 ACRES and 23 PROJECTS SINCE 1995

The Trust for Public Land is proud to join local partners working to transform the Los Angeles River into a usable river greenway. Our shared vision: a network of parks, trails, natural areas, and community spaces linking 13 cities and 25 communities along the 51-mile length of the river.

More than 9 million people live along the LA River, with 121 schools within walking distance along the way. Since 1995, The Trust for Public Land has protected more than 70 acres of riverfront land, to help “green” the river and its adjacent neighborhoods.



### Los Angeles State Historic Park

In 2001, The Trust for Public Land helped secure the Cornfields, now **Los Angeles State Historic Park**, a 32-acre property on the edge of LA's downtown and Chinatown. At that time it was an abandoned railyard slated for a one-million-square-foot industrial development.

### **Maywood Riverfront Park Acquisition**

The Trust for Public Land also worked with city leaders to double the acreage available for parks in Maywood, CA, the most densely populated city west of the Mississippi and home to more than 30,000 residents in only 1.13 square miles. With funding from California Propositions 12 and 13, and support from individuals and foundations, The Trust for Public Land acquired **six adjoining industrial parcels** along the Los Angeles River, and conveyed them to the city for creation of a new park site.

While Maywood Riverfront Park was completed in 2006, ultimately, this park complex will include a state-of-the-art playground for young children, basketball courts, and a riverfront bicycle path. Maywood city leaders also have pledged to create a \$1 million park stewardship fund to finance long-term park maintenance.

### **Marsh Street Pocket Park Acquisition**

Marsh Street Park is an approximately 1-acre pocket park located in a dense, mixed residential and industrial neighborhood in the City of Los Angeles. The park is situated along one of the rare and lush soft bottom sections of the Los Angeles River. Park amenities include whimsical playground equipment shaped as a serpent, seating areas, native plants, interpretive signs and a stormwater feature that captures and infiltrates stormwater and urban run-off from city streets adjacent to the site. Marsh Street Park also includes an adjacent skate area and in the coming years, the park site will expand to include a nearby lot.

### **Aliso Creek Confluence Park**

Our Los Angeles Office currently has one project-in-progress on the LA River: the Aliso Creek Confluence Park in Reseda, a multi-phase effort to create safe, usable open spaces for local residents to walk, jog, bike and explore nature close to home. Project plans include a new 2-acre park at the confluence of Aliso Creek and the LA River and a refurbished 1-mile trail connecting neighborhoods to the park and to each other. Trail improvements will include a new pedestrian bridge to cross Aliso Creek, native plantings, shaded benches, entry gates, interpretive signage and rest areas for cyclists and pedestrians.

### **Ongoing Partnerships**

In all of our river projects we've enjoyed the partnership of multiple agencies and partners across the city, county and state, including: The City of Los Angeles, The County of Los Angeles, Los Angeles Conservation Corps, Los Angeles Neighborhood Land Trust, The Santa Monica Mountains Conservancy, California Coastal Conservancy, City of Maywood, Mountains Recreation and Conservation Authority, the Rivers and Mountains

Conservancy, the Jewish Home for the Aging, Mujeres de la Tierra, the Reseda Neighborhood Council, the West Valley YMCA. California Department of Toxic Substance Control, Chinatown Yard Alliance (consisting of, among others, Chinese Consolidated Benevolent Society of Los Angeles, Concerned Citizens of South Central LA, Environmental Defense, the Friends of the LA River (FOLAR), Latino Urban Form, and the Natural Resources Defense Council), Regional Water Quality Control Board, and the State of California Department of Parks and Recreation.



## URBAN RIVERS NATIONWIDE

### THREE DECADES OF EXPERIENCE: OVER 1,200 ACRES OF RIVERFRONT PROPERTY IN NEW YORK, NEW JERSEY, AND GEORGIA

#### Hudson River Walkway, New Jersey

Twenty million people—and a diverse community of plants and animals—live within minutes of the harbor estuaries that connect New Jersey with New York (extending in New Jersey from Bergen County into Monmouth County). These important resources have been neglected following a century of industrial pollution at the harbors' edge.

The Trust for Public Land's work around the estuary began in the 1980s with the creation of the **Hudson River Walkway**. Today, we focus on protecting underdeveloped land in densely populated communities where open space is scarce and past industrial use has limited the public's access to the estuary and its tributaries. This work builds upon decades of cleanup efforts that encourage a return to the harbor front's natural estuary restoration.

With a parcel-by-parcel GIS analysis of the region complete, our New Jersey and New York offices are acquiring strategically critical properties and supporting community efforts to reclaim access to the rivers, protect natural lands, and increase parkland.

#### East River State Park, New York

We have protected more than 600 acres that connect to the harbor, **including Old Place Creek, South Brother Island**, and helped the North Brooklyn neighborhoods of Williamsburg and Greenpoint establish a new recreational foothold on the waterfront with its acquisition of two city blocks that now make up **East River State Park**.

The Trust for Public Land supports community efforts to reclaim public access to waterways, protect natural lands, and increase parkland in the country's most densely populated urban area, an ambitious undertaking stretching from Staten Island, through the lower and upper portions of New York Bay, and along both sides of the Hudson River up to the northern tip of Manhattan.

#### Buffer the Bay, New York

Our **Buffer the Bay greenprint** (published jointly with NYC Audubon) led to the protection of more than 600 acres in Jamaica Bay, including **Four Sparrow Marsh, Fresh and Spring Creek Preserves, Dubos Point Wetlands, Terra-Peninsula Point Preserve** and **Beach 88th Street Wetlands**.



In addition to the Buffer the Bay report, The Trust for Public Land has published four Greenprints in this geography, including the **Harbor Heron's Greenprint** and **Harlem River (Bronx side) Greenprint**, which featured recommendations for increasing public access, creating a greenway, restoring the edge – and increasing infiltration rates that can better absorb storm water and reduce coastal flood rates.

### Newark Riverfront Park, New Jersey



Together, the City of Newark and The Trust for Public Land developed the **7-acre Newark Riverfront Park**, along the Passaic River in the Ironbound neighborhood, where there is currently less than a half-acre of parkland per 1,000 residents. Over a 4-year period, the team facilitated a **public design process** to develop a project that reflects the history, culture, and interests of the community. The new park, which was featured on the front page of the New York Times, includes trails for walking and biking as well as a floating dock for access to the river. Other features include a riverfront boardwalk, a performance space, educational signage, and new plantings. This brownfield is located on the former site of a contaminated metal smelting plant, a Superfund site adjacent to the Passaic River.

The park design includes an environmental cap comprising two feet of clean soil and the removal of the hazardous soil. The space has turned from a neighborhood detriment to one of the most desirable and attractive places in the area and it stands as Newark's only public access point to the river. A formal open space with amenities to be shared by many, the park can now absorb flood waters through its resilient design.

### Proctor Creek, Georgia

The Trust for Public Land is working with multiple private, federal, and local partners to clean up and restore **Proctor Creek**, a heavily polluted tributary of the Chattahoochee River, and create an 11-mile greenway.

A mitigation bank is being established to help finance this effort. Proctor Creek was recently selected as a new **Urban Waters Partnership** site by the Environmental Protection Agency.

When completed, the project will provide increased access to parkland for Atlanta residents, connecting the Atlanta BeltLine (a network of public parks, multi-use trails and transit circling downtown Atlanta) with the Chattahoochee River.

## ALTERNATIVE 20: OUR CHOICE FOR THE LA RIVER & ECOSYSTEM RESTORATION

The Trust for Public Land joins Mayor Garcetti, the LA City Council and numerous partners in support of Alternative 20 for many reasons, particularly the enhanced ecosystem restoration included. The ambitious goals of the Corps -- to restore riparian and aquatic habitat, establish habitat connectivity, restore natural hydrologic processes and provide recreation -- are most fully expressed in this vision.

**Alternative 20 restores an additional 45 acres of habitat compared to the other alternatives.** These additional acres could be instrumental in the reintroduction and recovery of many Los Angeles Basin endangered, threatened and rare species that historically occupied marsh, riverine and riparian habitats in the Los Angeles River.

For example, the endangered least Bell's vireo (*Vireo bellii pusillus*) historically occupied habitat in Reach 2, and probably many other sections of the LA River. More recently, researchers documented this rare bird in the lower Sepulveda Reservoir/Los Angeles River near Burbank Boulevard and the Taylor Yard area. Biologists report there is a high probability of least Bell's vireo occurring in the project area. Certainly the addition of 45 acres of newly restored habitat provided in Alternative 20 will help this endangered bird recover from the brink of extinction.

Furthermore, the added habitat could eventually pay for itself in the form of mitigation banks set up to preserve habitat for protected species. The trend toward the use of habitat mitigation banks to offset development projects in nearby areas makes native habitat increasingly valuable, especially in the midst of a major metropolitan area.

The Trust for Public Land underlines the high importance of the following areas included in Alternative 20:

### **Reach 2: Midpoint of Bette Davis Park to Upstream End of Ferraro Fields**

Alternative 20 would provide an additional 10 acres of vital in-channel freshwater marsh habitat. Sensitive wildlife species that could eventually benefit from this additional habitat include the threatened Santa Ana sucker (*Catostomus santaanae*), the endangered unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*) and the endangered arroyo toad (*Anaxyrus californicus*).

Added marsh habitat in Reach 2 could also aid the recovery of several listed plants, including the endangered marsh sandwort (*Arenaria paludicola*) the endangered Gambel's

watercress (*Nasturtium gambelii*), and the endangered Ventura marsh milke-vetch (*Astragalus pycnostachyus* var. *lanosissimus*).

**Reach 3: Ferraro Fields /Verdugo Wash Area.** The inclusion of this area maximizes tributary reconnection at an important connecting point for regional habitat migration. The confluence provides an important corridor from the Santa Monica Mountains to the Verdugo and San Gabriel Mountains, all areas regularly served by The Trust for Public Land and our partners.

Alternative 20 adds another 35 acres of vitally important habitat. New riverine habitat would be created by restoring the confluence and a section of Verdugo Wash to its natural state. The same endangered and threatened species listed in Reach 2 above would benefit from this additional habitat.

**Reach 7: Arroyo Seco/LA River Historic Park (Cornfields).** As the initial protection of this riverfront property was completed by The Trust for Public Land, the Cornfields area is especially close to our hearts. The marsh restoration proposed here in Alternative 20 widens the river channel and brings significant soft bottom restoration in a part of the river important to surrounding low-income communities. The ten acres of wetland marsh included in the park will bring about dramatic change for the river, and those who will enjoy the habitat environment and wildlife that will be able to call the area home.

Alternative 20 provides an additional nine acres of riparian habitat. Riparian habitat frequently contains the highest biological diversity in Southern California landscapes, but it is often the rarest habitat type. Added riparian habitat provided in Reach 7 could aid the recovery of several listed species, including the endangered least Bell's vireo (*Vireo bellii pusillus*), the endangered Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) and the endangered southwestern willow flycatcher (*Empidonax traillii extimus*).

**Reach 8: Piggyback Yard.** The expansive restoration in this crucial downtown area is a must-have in everyone's vision of the LA River. Adding a soft-bottom channel here will restore riparian forests capable of supporting endangered wildlife, and greatly increase the hydrologic connection to the floodplain and overbank areas.

Alternative 20 (and 16, compared to 13) would add another 17 acres of vital wetland marsh habitat to the project. Numerous endangered and threatened species would benefit from this additional habitat, including those listed above in Reach 7.

## RESTORING NATURE— RESTORING THE SPIRIT

All of our work at The Trust for Public Land underscores the benefits of open space and parks on people, especially children.

For the 80 percent of Americans who live in or near a city, neighborhood parks provide the closest experience with nature. Yet, 80 percent of US census blocks do not have a park within a half-mile, according to report by the Center for Disease Control and Prevention.

As a result, an entire generation is growing up without a connection to nature, missing out on the daily chance for recreation, exercise, community, and renewal that parks provide. The Trust for Public Land believes that every American—in particular, every child—should live within a ten-minute walk of a park or playground. Parks reduce crime, revitalize local economies, and bring neighborhoods together. They also promote public health, lowering a community’s collective risk of obesity, diabetes, and other illnesses linked to inactivity.

Restoring the LA River, and expanding green space and increasing recreation will bring multiple benefits to Los Angeles residents.

### **Physical Health Benefits**

There is strong evidence that when people have access to parks and green space, they exercise more. In a study published by the CDC, creation of or enhanced access to places for physical activity led to a 25.6 percent increase in the percentage of people exercising on three or more days per week.

A group of studies reviewed in the *American Journal of Preventive Medicine* showed that “creation of or enhanced access to places for physical activity combined with informational outreach” produced a 48.4 percent increase in frequency of physical activity.

The same group of studies showed that access to a place to exercise results in a 5.1 percent median increase in aerobic capacity, along with a reduction in body fat, weight loss, improvements in flexibility, and an increase in perceived energy.

When people have nowhere to walk, they gain weight. Obesity is more likely in un-walkable neighborhoods, but goes down when measures of walkability go up: dense housing, well-connected streets, and mixed land uses reduce the probability that residents will be obese.



Beyond the recreational opportunities offered by parks, a growing body of research shows that contact with the natural world improves physical and psychological health. One important study reviewed the recoveries of surgical patients in a Pennsylvania hospital. The rooms of some patients overlooked a stand of trees, while others faced a brown brick wall. A review of ten years of medical records showed that patients with tree views had shorter hospitalizations, less need for painkillers, and fewer negative comments in the nurses' notes, compared with patients with brick-wall views.

### **Mental Health Benefits**

The benefits extend to psychological health. "The concept that plants have a role in mental health is well established," according to a review of previous studies by Howard Frumkin in the *American Journal of Preventive Medicine*. "Horticultural therapy evolved as a form of mental health treatment, based on the therapeutic effects of gardening. It is also used today in community-based programs, geriatrics programs, prisons, developmental disabilities programs, and special education."

Further, "research on recreational activities has shown that savanna-like settings are associated with self-reported feelings of 'peacefulness,' 'tranquility,' or 'relaxation,'" Frumkin writes. "Viewing such settings leads to decreased fear and anger...[and] is associated with enhanced mental alertness, attention, and cognitive performance, as measured by tasks such as proofreading and by formal psychological testing."

An extensive study published in 2001 in the Netherlands set out to determine the link between green space and health. The study overlaid two extensive databases, one with health information on more than 10,000 residents of the Netherlands, and the other a land use database covering every 25-by-25-meter square in the nation, allowing researchers to know which people lived near city parks, agricultural land, and forests and nature areas.

The study produced several key findings. First, "in a greener environment people report fewer health complaints, more often rate themselves as being in good health, and have better mental health," the study found. Second, "when it comes to health, all types of green seem to be equally 'effective'"; the study found the same benefit from living near city parks, agricultural areas, and forest.

A ten percent increase in nearby green space was found to decrease a person's health complaints in an amount equivalent to a five year reduction in that person's age. Important theoretical foundations were laid in this area by Harvard biologist Edward O. Wilson, who in 1984 hypothesized the existence of biophilia, "the innately emotional affiliation of human beings to other living organisms."

Others have extended this idea to postulate “an affinity for nature that goes beyond living things, to include streams, ocean waves, and wind.”<sup>43</sup> This affinity may stem from evolutionary roots: “For the great majority of human existence, human biology has been embedded in the natural environment,” Frumkin writes. “Those who could smell the water, find the plants, follow the animals, and recognize the safe havens, must have enjoyed survival advantages.”

Several studies have shown that greenways increase regular physical activity. [Ross C. Brownson, *Promoting and Evaluating Walking Trails in Rural Missouri* (St. Louis: St. Louis University School of Public Health, 1999); Eppley Institute for Parks and Public Lands, School of Health, Physical Education and Recreation, Indiana University, *Summary Report Indiana Trails Study: A Study of Trails in 6 Indiana Cities* (Bloomington: Indiana University, 30 November 2001)]. The Safe Routes to Schools programs use trails to encourage safe physical activity for children.

Outdoor play also provides therapy for children with attention deficit disorder (ADD). Researchers discovered that children with ADD do better following activities in green areas. [Andrea Faber Taylor et al., “Coping with ADD: The Surprising Connection to Green Play Settings,” *Environment and Behavior* 33, no. 1 (January 2001): 5-34].

### **Social Benefits**

Among the most important benefits of urban parks and green space – though perhaps the hardest to quantify – is their role as community development tools. Green spaces make neighborhoods more livable; they offer recreational opportunities for at-risk youth, low-income children, and low-income families; and they provide places where people can experience a sense of community.

More parks can provide a better social environment for low-income children. A study by the University of Illinois and the University of Chicago stated, “In inner-city neighborhoods where common spaces are often barren no-man’s lands, the presence of trees and grass supports common space use and informal social contact among neighbors.” A University of Missouri-Saint Louis study also found that St. Louis neighborhoods with community gardens were more stable overall than other neighborhoods.

Our shared vision of a restored Los Angeles River promises natural places for vibrant recreation and interaction, to enliven the spirits of LA residents and visitors alike.

Reports cited from *The Benefits of Parks*, The Trust for Public Land, January 2003, and *The Health Benefits of Parks*, The Trust for Public Land, November 2006:

<http://www.tpl.org/publications/books-reports/park-benefits/benefits-of-parks-white-paper.html>

<http://www.tpl.org/publications/books-reports/park-benefits/the-health-benefits-of-parks.html>

## CONCLUSION

All of us at The Trust for Public Land are delighted to be part of the exciting renaissance taking place on the Los Angeles River. We honor the work of the Army Corps of Engineers and all partners in preparing this important study, and the hope it has generated for so many of our constituents across Los Angeles.

Alternative 20 accomplishes beautifully the goals of the ARBOR study: to restore habitat, increase connectivity, and enhance recreation. We look forward to continuing our relationship with the City and County of Los Angeles, in addition to federal, state and local partners – to bring our shared dreams of the Los Angeles River to life.



**THEODORE PAYNE  
FOUNDATION**  
**for Wild Flowers &  
Native Plants, Inc.**  
ESTABLISHED 1960

**PROGRAMS**

Fall Festival  
Library and Archives  
Native Plant Garden Tour  
Poppy Day  
Seed Collection  
Theodore Payne Nursery  
Wildflower Hotline  
Workshops and Classes

November 12, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones  
CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

This letter is to state that the Board of Directors of the Theodore Payne Foundation for Wild Flowers and Native Plants has determined to endorse Alternative 20 and sign on to the petition that follows.

Official Resolution in Support of the Selection of Alternative 20

WHEREAS, the Los Angeles River is the lifeblood of our community and a vital resource to be restored and protected; and

WHEREAS, in 2006, the Los Angeles City Council approved an agreement with the US Army Corps of Engineers (Corps) for the Los Angeles River Ecosystem Restoration Feasibility Study (Study); and

WHEREAS, in 2013, the Corps has developed a final array of four alternatives for the Study, and only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing a profound hydrological link between the Los Angeles State Historic Park and the river; and

WHEREAS, these two areas provide critical wildlife habitat connectivity to the Verdugo and Elysian Hills, respectively, and are included in the five key opportunity areas of the City Council-adopted Los Angeles River Revitalization Master Plan, which the US Congress directed the Corps to consider; and

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WHEREAS, **Alternative 20** provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from the river's channelization—providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles

***NOW, THEREFORE BE IT RESOLVED, that the undersigned supports the selection and full implementation of Alternative 20 by the United States Army Corps of Engineers to restore our Los Angeles River.***

By signing, I agree to submit my name and the name of the Theodore Payne Foundation for Wild Flowers and Native Plants as an official public comment regarding implementation of the Los Angeles River Ecosystem Restoration Feasibility Study.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynnette Kampe". The signature is fluid and cursive, with the first name being more prominent.

Lynnette Kampe  
Executive Director



November 15, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

**Los Angeles River Ecosystem Restoration Feasibility Study**  
**Draft Integrated Feasibility Report**

Dear Dr. Axt,

TreePeople is pleased to have the opportunity to comment on the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report. TreePeople is one of the largest and longest-established environmental organizations in California, celebrating our 40<sup>th</sup> anniversary this year.

We are consistently asked at TreePeople about health of the LA River. Something about the LA River captures the imagination. Having a restored river ecosystem in the middle of our city would create a massive shift in the minds of Angelenos, making our connection to nature, the value of water, and our role as caretakers of our water supply, much more real.

At TreePeople we work daily to make the connection between the land outside our front doors to our rivers and our ocean. At TreePeople's Center for Community Forestry, our LaKretz Watershed Education Center teaches thousands of school children a year about the connection we have as city dwellers to the Los Angeles River and a clean, local water supply. Students get to see firsthand the damage and pollution resulting from too many paved surfaces, forcing water that once nourished our soil and aquifers to be shed and wasted, causing water pollution as well as the need to import water from elsewhere. Having a restored river will be an educational as well as recreational resource that will make a huge difference to our entire city and region.

Based on our 40 years dedicated to restoring Los Angeles' urban land to function as a living watershed, TreePeople supports Alternative 20. This Alternative provides the highest value to our city in environmental, economic, and social terms. For too long, L.A. has been managed as a concrete drain, sending water over streets and pavement to the L.A. River, where the polluted water goes out to sea. Not only is water flushed away, but also money, as we pay mounting costs to mitigate the pollution and replace local rainwater with imported water for our water supply. Alternative 20 does the most to restore nature, and the natural functions of a healthy watershed, via habitat restoration on key large parcels of land. It provides the most tree canopy – sorely needed to protect L.A. residents from extreme weather, including heat waves, droughts and flooding. It also revitalizes much-needed green spaces in areas particularly affected by environmental justice issues.

TreePeople believes this Alternative will do the most to improve not only our environmental health, but the physical health of our residents, which research increasingly shows to be closely tied to the amount of nature we can access in our urban landscape. It does the most to connect Angelenos to local water, something we are currently too divorced from. The City of Los Angeles imports nearly 90% of its water from distant and increasingly impacted

sources. Having a functioning river ecosystem in our city will connect Angelenos more closely to local water as a resource, not as waste. It will help us to more clearly understand the cost-effective ways that we can create a clean, secure, local water supply by harvesting, storing, and conserving our rainwater, rather than throwing it away. This is a once in a lifetime opportunity.

TreePeople strongly believes in integrated government functions -- meaning integrated programs and projects that create greater efficiencies and save the city, and region, money. One thing we would like to see as the designs move forward is increased attention to the opportunities presented for multi-benefit projects (i.e., projects that not only restore habitat, but also contribute to increasing our local water supply, and decrease our water pollution). Multi-benefit projects can also leverage funding from additional stakeholders.

There have been many originally unanticipated costs to the environment and our economy from channelizing the River. We believe that we should look at restoring as many of the original benefits as possible given this amazing opportunity to revitalize the L.A. River.

Thank you for this opportunity to comment,



Andy Lipkis  
Founder & President

College of  
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18 November 2013

Josephine Axt  
US Army Corps of Engineers Los Angeles District  
915 Wilshire Boulevard, Suite 1101  
Los Angeles, CA 90017  
*Josephine.R.Axt@usace.army.mil*

**Comments on Draft Integrated Feasibility Study, Los Angeles River Restoration**

Dear Josephine,

Thank you for the opportunity to submit these comments on the Draft IFR for the Los Angeles River Restoration project. Overall, the Draft Integrated Feasibility Study represents an excellent compilation of relevant information and background for the Los Angeles River Restoration Project. However, as documented here, there are some important concerns with the basis for the selection of the preferred alternative presented in the document. The proposed restoration project includes sites within an 11-mile reach of the river, focusing on a reach with a mostly alluvial bed characterized by high groundwater levels (the ‘soft-bottomed’ reach). As such, the restoration project is already ‘cherry picking’ among the best opportunities for restoration along the urban Los Angeles River. This implies that the specific components presented in the various alternatives already represent optimal projects for ecosystem restoration along this river in a highly urban environment.

1

***Comparing Selection of Preferred Alternative with USACE Policy Guidance***

Reviewing the policy guidance summarized in ER-1105-2-100 (USACE 2000), it appears that the Corps has considerable latitude regarding the choice of the preferred plan.

“Neither cost effectiveness analysis nor incremental cost analysis include a “one plan” selection rule similar to the “NED (National Economic Development) plan” selection rule for NED evaluations. In the absence of such a decision-making rule, neither analysis dictates what choice to make. However, the information developed by both analyses can inform decision making by progressively proceeding through the available levels of output to ask whether the next level is “worth it”; that is, whether the environmental benefit of the additional output in the next level is worth its additional cost.” (USACE 2000, pp.E-156-E157)

In deciding whether the environmental benefits of additional output is “worth it”, the Corps is to take into account, in part, the significance of the resource, as reflected by scientific information and institutional recognition.

“Significance based on institutional recognition means that the importance of an environmental resource is acknowledged in the laws, adopted plans, and other policy statements of public agencies, tribes, or private groups.” (USACE 2000, p. E-159)

The significance of the potential benefits from the Los Angeles River restoration projects have been abundantly reflected in actions of local governments and non-governmental organizations, notably the commitment by the City of Los Angeles to an unprecedentedly high local cost share, and the city’s support for the more substantive restoration under Alternative 20.

1

“Public recognition means that some segment of the general public recognizes the importance of an environmental resource, as evidenced by people engaged in activities that reflect an interest or concern for that particular resource. Such activities may involve membership in an organization, financial contributions to resource-related efforts, providing volunteer labor, and correspondence regarding the importance of the resource.” (p.E-160)

The extraordinary public support for restoration of the Los Angeles River, and specifically for the more extensive restoration that would be implemented under Alternative 20, is manifest in the active support of grass-roots organizations with large membership bases, such as Friends of the Los Angeles River (FoLAR) and the Council for Watershed Health, as well as national environmental groups.

### ***In-Channel vs Off-Channel Habitat Value***

As stated in Section 6.3 and in Appendix G, Section 7.0 (USACE 2013), the Combined Habitat Assessment Protocol (CHAP) does not give greater weight to in-stream habitat, and the method does not consider the benefits of the hydrologic and habitat nodal connectivity, despite the fact that such in-channel and connected habitats are known to be more valuable ecologically. Thus, the analysis may overvalue the benefit of off-channel habitats, such as those separated from the channel by a road or other barriers in Reach 1. Although Alternatives 16 and 20 have higher per habitat unit incremental cost, the habitat quality added in these alternatives is likely to be much higher by virtue of being in-stream and/or hydrologically connected to the main channel. However this real difference in habitat value is not captured by the Combined Habitat Assessment Protocol.

2

While Section 6.3.1 provides a comparison of restoration of natural hydrological function and habitat connectivity, it does not provide a convincing justification for Alternative 13 as the best option. A more nuanced evaluation with a better scientific basis, accounting for value of in-channel over off-channel habitat, and the value of connectivity, would likely indicate that Alternatives 16 and 20 are superior. It might be interesting to see how eliminating off-channel habitats would affect the results of the Cost Effectiveness/Incremental Cost Analysis (CE/ICA), as the over-rated off-channel habitats may bias the final rankings.

Although the study has three stated objectives, the CHAP benefit analysis method focuses mainly on the first objective, area of habitat. Clearly, current scientific research would indicate that connectivity can be equally or more important ecologically than number of acres of a habitat type. The implicit bias towards habitat acres (Objective 1) and de-emphasis on connectivity (Objective 2) means that while connectivity was considered in alternative formation, it was evidently not adequately represented in the CE/ICA analysis. A similar critique could be made for passive recreation (Objective 3), which in this dense urban setting assumes an importance far greater than would be the case for the more typical restoration project setting.

2

### ***Other Limitations of the CE/ICA Analysis***

In the CE/ICA analysis, since the incremental analysis looks for a high unit cost delta between alternatives, to determine the level of restoration that meets the cost benefit objective, the selected project would likely include a large amount of “lower hanging fruit” (such as replanting the existing open space to create riparian planting palette like Reaches 1 and 2). More substantive project components, such as lowering the existing river banks to reconnect floodplain, would likely be excluded from the project, due to their high cost for a relatively smaller footprint. However, these excluded components may be critical to establish a self-sustaining, resilience river ecosystem, but might be deemed un-economic based on the CE/ICA structure.

3

The CE/ICA analysis did not consider the future opportunity costs. For example, some project components a given alternative may appear to be less economically justified based on the CE/ICA analysis. However, if these components are not implemented now, they will be more costly or even impossible to implement in the future. For example, if Alt 13 instead of Alt 20 were selected, some of the land that would be used for restoration under Alternative 20 may be lost to urban development, precluding future restoration. The CE/ICA analysis did not consider these types of irreversible impacts, but such impacts should be considered in restoration planning.

### ***Premature Dismissal of Tunneling Options and Implications for Alternative Selection***

For a given project, the CE/ICA analysis can point to different conclusions based on the set of alternatives defined for the analysis. If CE/ICA evaluation included tunneling alternatives in the analysis, based on the rules of CE/ICA, the selected alternative would likely have been Alternative 20, not Alternative 13 (USACE 2013, Appendix B, Figure 6.1).

4

As described in Appendix B, Economics Analysis of USACE (2013), early in the alternative evaluation process, the project team dismissed tunneling alternatives due to prohibitive cost. However, tunneling alternatives meet the study objectives, so properly they should not have been dismissed prior to the analysis. These alternatives should proceed to CE/ICA and be evaluated in the analysis. It is during the CE/ICA analysis that overly expensive alternatives are identified and can be rejected, but to arbitrarily throw out alternatives that have not yet been analyzed undermines the entire basis of the analytical



process.

The guidance on conducting CE/ICA analyses (USACE 2000) recommends,  
“Graphing the Best Buy plans can help visually display the relationship between the increasing financial investment required for increasing environmental outputs.” (USACE 2000, p.E-156)  
The graph can be inspected to identify abrupt increases in cost as a basis for determining  
“whether the next level is “worth it”; that is, whether the environmental benefit of the additional output in the next level is worth its additional cost.” (USACE 2000, p.E-156-157)  
“Often this questioning process will tend to continue to conclude that successive levels of output are “worth it” until an unusual increase in incremental costs, beyond the general range of preceding costs, is encountered.” (USACE 2000, p.E-157)

4

The jump in cost between Alternatives 13 and 16 was a principal basis cited for selecting Alternative 13 as the preferred alternative in USACE (2013). However, as shown in Figure 6-1 of Appendix B (USACE 2013, App B, p.36), if the tunneling alternatives were considered, the largest incremental cost jump will not be from Alternative 13 to Alternative 16, but from Alternative 20 to the cheapest tunneling alternative. This has important implications for which alternative is selected. Simply stated, if the tunneling options had not been arbitrarily and prematurely eliminated prior to the CE/ICA analysis, the CE/ICA would probably have led to the conclusion that Alternative 20 to be the Tentatively Selected Plan (TSP).

***Distinctive Attributes of Urban River Restoration***

The context of urban river restoration is distinct from the context of restoration undertaken in more rural areas. The ecological potential will always be limited by encroachment of development near the river channel, but the relative ecological importance of a smaller number of sites near an urban river can be proportionally greater. Moreover, the social benefits from providing passive and active recreation along the river corridor, and the potential for ecological education, especially for children from disadvantaged backgrounds, cannot be overstated. On the Los Angeles River, the passive recreation (Objective 3) appears not to have received comparable weight to the acres of habitat restored (Objective 1) because of the way the CE/CIA model was run, biasing the results away from a very important objective in the urban context.

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Unlike restoration projects in rural areas, one of the most critical needs for urban river restoration projects adequate space for natural river forms and processes, and to allow for floodplain reconnection. With high land values in urban areas, it is an expensive need. As noted in Section 3.3.4, Table 3-5 (USACE 2013), although 59% of total study area is already in Open Space/Recreation land use, the land acquisition cost is still over \$300 million. With high land value and limited available river corridor, typical restoration options are (1) river enhancement focused on recreation and aesthetics, with limited ecological value, or (2) expensive land acquisition to provide space for river and floodplain processes. The policies limiting the percentage of the project budget that can be applied to land acquisition create significant limitations on urban creek restoration. Even in this project where the local sponsor is willing to shoulder the total cost of land acquisition and this component of the budget is far greater than typical,

6

it requires explicit approval to waive the reimbursement. The specifics of the Los Angeles River project demonstrate that this land acquisition policy needs to be reexamined, especially for urban projects.

We recommend that a distinct planning process be developed for urban settings to better capture important potential benefits, especially in view of the increasing importance of restoration in urban contexts.

6

### ***Lack of Integration of Ecosystem and Restoration and Flood Risk Management***

A striking feature of some parts of the soft-bottomed reach of Los Angeles River, such as the Taylor Yard reach, is the dense growth of riparian vegetation within the active channel in the form of vegetated mid-channel bars and islands. Largely as a result of the encroachment of vegetation into the active channel, the channel capacity has been reduced, in the worst-affected places to approximately that of a 9-year return interval flood. Regulatory protections for riparian habitat have thus far prevented removal of mid-channel vegetation. It would seem a logical ‘win-win’ if removal of mid-channel vegetation could occur simultaneously with establishment of riparian vegetation on the adjacent floodplain as planned under the Project. The riparian habitat on the floodplain could more than compensate for that lost in the channel. However, this is not proposed in the IFR (Integrated Feasibility Report), and we understand this not under consideration because the ecosystem restoration and flood risk reduction ‘accounts’ cannot be mixed. No doubt there were some valid reasons for a policy to avoid mixing of the accounts, but in the current case, when viewed from a common-sense perspective outside of the self-referential world of USACE policy, it is clearly an opportunity lost. In fact, it is unrealistic to discuss ecosystem restoration only, while ignoring the reduced channel capacity of some parts of the soft-bottomed reach.

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The ARBOR (Area with Restoration Benefits and Opportunities for Revitalization) reach does not currently provide 100-year flood protection. If existing vegetation and sediment were removed from the active channel in most encroached areas, as per the original project O&M (operations & maintenance) requirements, the channel conveyance would increase to about the 25-year flood. If the proposed project only maintains existing flood conveyance capacity, flood risk is greater than would be the case under the original design condition, and thus it would result in higher premiums under the FIRM program. If the proposed project were to restore the original 25-year design capacity, the project will still trigger FEMA map revision, but the flood risk and thus the premiums would not increase. With or without the proposed project, a FEMA map revision is inevitable under the Biggert-Waters Flood Insurance Reform Act of 2012.

It is notable that the authorization for the study does not restrict the Corps to look only at ecosystem restoration:

“Section 4018 of the Water Resources Development Act of 2007 provided authorization for a “feasibility study for environmental ecosystem restoration, *flood risk management, recreation, and other aspects of Los Angeles River revitalization that is consistent with the goals of the Los Angeles River Revitalization Master Plan published by the city of Los Angeles....*” The implementation guidance for this section identified that the scope and substance of the study under the Senate resolution is identical to the study mandated by section

4018 and directed that the ongoing study incorporate the section 4018 study. The feasibility study incorporates, where applicable, conceptual elements and addresses restoration goals from the City’s Los Angeles River Revitalization Master Plan.

“This feasibility study provides an interim response to the study authority, and the study efforts will determine the feasibility of ecosystem restoration of the Los Angeles River and surrounding environment. There is no sponsor available to investigate flood risk management at this time.”  
(USACE 2013, pp.1-11 – 1-12; emphasis added)

The reason given for not considering flood risk management is, “There is no sponsor available to investigate flood risk management at this time.” The lack of a local sponsor is probably because the Corps has O&M responsibility for this reach of the Los Angeles River, not the Los Angeles County Flood Control and Water Conservation District. Because it is the Corps’ responsibility, the lack of a local sponsor is not surprising, but irrelevant. The tragedy is that there are undoubtedly multiple benefits that could accrue from integrating the two study purposes, such that ecosystem restoration is integrated with flood risk management. The integration of these two goals and its potential synergies are more of a 21<sup>st</sup>-Century concept of watershed planning, in contrast to single-purpose studies, such as the artificially isolated view of ecosystem restoration only, as presented in the IFR. The study authorities from Congress encompassed more than ecosystem restoration, but only ecosystem restoration was addressed in the IFR. Thus, the formulation of the project was over-constrained by narrowing the objectives. Rather than think along separate lines of ecosystem restoration and flood risk management, we recommend adopting a more holistic approach of *floodplain management*, following on the concepts developed for the Unified National Plan for floodplain management, including *wise use* of floodplains.

There many structures along the Los Angeles River exposed to flood risk currently, as illustrated in Plates 23a and 23b of USACE (2013), which shows the area threatened by the 100-year flood, including dense residential areas and commercial/industrial areas, where many people may believe that they are currently protected from flooding. Developing a project that would protect some of these structures could yield benefits that could help pay for ecosystem restoration.

**Summary and Recommendations**

In sum, the Los Angeles River Ecosystem Restoration project represents a bold step by the US Army Corps of Engineers to undertake ecosystem restoration in a dense urban environment. However, our review of the IFR identified some ‘fatal flaws’ that we believe merit consideration:

- 1) Reliance on the CHAP model results in a bias towards the number of ‘acres restored’ and fails to account for the importance of hydrologic connectivity and social values of restoration in this urban setting.
- 2) The incremental restoration approach may be a flawed paradigm, in that it does not effectively account for process and the importance of ecosystem attributes such as connectivity. A restoration component that is expensive but essential for the overall functioning of the system could be rejected because of its high cost per unit area.
- 3) Arbitrary exclusion of tunneling alternatives from the CE/ICA analysis created the impression that the greatest increase in costs was from Alternative 13 to Alternative 16, whereas the greatest increase

would be from Alternative 20 to the cheapest tunneling alternative, which would support selection of Alternative 20 rather than 13.

4) Although flood risk reduction was an authorized purpose of the study, it was not addressed in the IFR, which artificially limited itself to ecosystem restoration. Because of the degraded performance of the concrete channel system, there should be opportunities to improve flood capacity combined with ecosystem restoration. An integrated approach to reducing flood risk and restoring ecological and social values could yield substantial benefits in this urban area, such that flood reduction benefits could help pay for ecosystem restoration.

5) The IFR represents a ‘single-purpose’ approach, in contrast to more advanced and nuanced approaches to floodplain management that can benefit from synergies among multiple objectives.

6) The current Corps planning process appears ill suited to restoration in dense urban environments, especially the policies limiting land costs as percentage of overall project costs. Given the likely increasing importance of ecosystem restoration in urban areas, it may be worthwhile for the Corps to develop a planning approach better adapted to the opportunities and constraints of urban settings.

We hope these comments are useful to you, and we would be happy to discuss further any of them.

Sincerely yours,



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ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

November 15, 2013

Dear Dr. Axe.

My name is Elana Zilberg. I am a professor at the University of California San Diego with over twenty years of conducting ethnographic research in the city of Los Angeles. In the last three years, I have turned my attention specifically to the revitalization of urban rivers in the Southwestern United States, focusing primarily on the Los Angeles River in California, and San Antonio River in Texas. For the purposes of my letter today, I focus on the Los Angeles River, although the San Antonio River and the ecological restoration of its southern stretch is wonderful example of what the Army Corps of Engineers can achieve in collaboration with local agencies.

First, let me applaud you and the Army Corps of Engineers for devoting time, effort and resources to producing your feasibility report for the ecological restoration of the 11 mile stretch of the River from the Glendale Narrows through downtown Los Angeles. After having read your report and attending various government and community meetings, I have concluded that Option 20 is the best plan on the table.

While it is the most expensive plan, Option 20 comes closest to the vision put forth in the 2007 Los Angeles River Master Plan and dovetails well with President Obama's American Great Outdoors Initiative and the Urban Waters Public Partnership. Option 13 simply does not go far enough in making up for the destruction of the habitat and species that once flourished in and along the River. Moreover, it does not go as far in restoring the relationship between the people of Los Angeles and the River. Including the Verdugo Wash and Piggyback Yard in the restoration project has a much greater chance of achieving both ecological restoration and human connection.

I won't reiterate the long list of what Option 20 offers than Option 13 does in the realm of ecological restoration, which is I understand your primary focus. As a cultural and urban anthropologist with a particular interest in the political ecology of cities, I have been inspired by the momentum and energy galvanized around the revitalization of the Los Angeles River. It is clear that the broad constituencies that have come together around the River, feel very strongly that Option 20 will have the greatest impact in restoring some semblance of the former



November 18, 2013

ecosystem of the River, and in improving the quality of life for its residents - particularly for those living in the vicinity of the area but also for the city's residents at large.

Option 20 simply goes much further in meeting the criteria laid out in your study. I therefore urge the Corps to join the City in putting their support behind Option 20.

Yours sincerely,

Elana Zilberg  
Associate Professor  
Director of Graduate Studies

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November 18, 2013

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**Re: Union Pacific Railroad Company's Comments to SPL-2013-003-NLH-Draft  
Integrated Feasibility Report for Los Angeles River Ecosystem Restoration Study**

Dear Ms. Axt:

Union Pacific Railroad Company ("UP") appreciates this opportunity to comment on the September 2013 Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report ("Draft IFR"), prepared by the U.S. Army Corps of Engineers ("Corps") and City of Los Angeles ("City"). UP owns the Los Angeles Trailer and Container Intermodal Facility ("LATC") rail yard in downtown Los Angeles, incorrectly referred to as the "Piggyback Yard" in the Draft IFR. UP has a specific interest in the four action alternatives analyzed under the Draft IFR since all would result in the conversion of the LATC property from its current industrial use to riparian/wetland habitat. For the reasons discussed below, UP opposes action alternatives 10, 13, 16 and 20 because they would require the conversion of the LATC property from its current use to riparian/wetland.

The first step in any joint federal-state project is completing adequate environmental review under the California Environmental Quality Act ("CEQA")<sup>1</sup> and the National Environmental Policy Act ("NEPA")<sup>2</sup>. After closely examining the Draft IFR, however, it is clear that the Corps's environmental review of the project is flawed. First, the Draft IFR does not adequately analyze all feasible project alternatives. Second, the four action alternatives identified in the

<sup>1</sup> Cal. Pub. Res. Code §§ *et seq.* CEQA applies to "discretionary projects proposed to be carried out or approved by public agencies, including, but not limited to, the enactment and amendment of zoning ordinances, the issuance of zoning variances, the issuance of conditional use permits, and the approval of tentative subdivision maps unless the project is exempt from this division" (*Id.* at § 21080).

<sup>2</sup> 42 U.S.C. §§ 4331 *et seq.* NEPA applies to "proposals for legislation and other major Federal actions" and in cases where an agency is exercising its discretion in deciding whether and how to exercise its authority over an otherwise non-Federal project. (*Id.* at § 4332(2)(c)).

Draft IFR include unrealistic and unachievable conclusory assumptions about the feasibility of relocating the LATC. Finally, the Draft IFR fails to properly consider the importance of the rail yard's integral role in the national transportation infrastructure, effects on the human environment, and environmental justice and socio-economic factors, as explained in greater detail below. For these reasons, UP opposes the four action alternatives identified in the Draft IFR to the extent that they involve changes at the LATC.

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### **The LATC is a Critical Component of UP's Domestic Intermodal Traffic Network**

The Los Angeles Corridor is one of the City's main rail transportation corridors. UP first established its rail maintenance facility at the LATC in the early 1900s. Today, UP's modern 120-acre intermodal, i.e., truck to rail and rail to truck, container facility receives, sorts and distributes approximately 240,000 cargo containers per year, ninety-five percent of which are domestic. (UP Operating Data, October 2013). Activities at the LATC include receiving inbound trains, switching cars, loading and unloading intermodal trains, storing intermodal containers and chassis, building and departing outbound trains, and repairing freight cars and intermodal containers and chassis. The LATC also provides forty-seven percent of California car transport and service to the neighboring United Parcel Service facility, serves as a relief valve for the Port of Los Angeles traffic, and has become a vital component of the nation's transportation infrastructure.

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Currently, the LATC operates at near fluid capacity and UP plans to undertake major improvements to the railyard in the near future. This \$100 million modernization project will ensure the most efficient operation and utilization of the LATC, with a particular emphasis on future growth. In addition, UP leads Class I Railroads in the purchase and deployment of Generator-Set switcher locomotives ("GenSets"), which significantly reduce air emissions and use less fuel than their counterparts. Eight of these GenSets, costing approximately \$1.5 million dollars each, are used at the LATC. In addition, UP has spent more than \$3 million dollars to update cargo handling equipment at the rail yard since 2012.

### **Railroad Operations are Under the Exclusive Jurisdiction of the Federal Surface Transportation Board**

Only the Federal Surface Transportation Board (STB) has authority to regulate the use of railroad property. As set forth in the Interstate Commerce Commission Termination Act (ICCTA) the STB has exclusive and preemptive jurisdiction over:

- (1) transportation by rail carriers, and the remedies provided in this part with respect to rates, classifications, rules (including car service, interchange, and other operating rules), practices, routes, services, and facilities of such carriers; and
- (2) the construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team, switching, or side tracks, or facilities, even if the tracks are located, or intended to be located, entirely in one State, is exclusive. Except as otherwise provided in

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this part, the remedies provided under this part with respect to regulation of rail transportation are exclusive and preempt the remedies provided under Federal or State law. 49 U.S.C. § 10501(b).

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Thus, Union Pacific's continued operation of the LATC cannot be disturbed except as directed by the STB. Accordingly, the Draft IFR's assumption that a project requiring relocation of the LATC is feasible may not be realistic, and is not adequately supported in the Draft IFR.

**All Draft IFR Action Alternatives Require Conversion of UP's Property, Result in Significant Adverse Impacts, and Will Obstruct and Preclude UP's Ongoing and Future Operations at the LATC**

The Draft IFR evaluates alternatives for restoring approximately eleven miles of the Los Angeles River from Griffith Park to downtown Los Angeles, and includes a Draft Feasibility Study and a joint Environmental Impact Report ("EIR")/ Environmental Impact Statement ("EIS"). Ultimately, the Draft IFR analyzes a total of four final action alternatives—Alternatives 10, 13, 16 and 20—and concludes that all would require conversion of the LATC property from industrial use to riparian/wetland habitat, result in significant adverse impacts to air quality, land use, traffic and circulation, socioeconomics, and environmental justice, and preclude UP's ongoing and future operations at the site.

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As detailed in the Draft IFR (Tables 6-7 and ES-5), Alternatives 10 and 13 propose partially converting the existing LATC to riparian and wetland habitat, restoring the historic wash, temporarily removing rail lines, permanently removing spur lines in the rail yard's interior, and removing railyard storage capacity. The work would include the removal of standing structures, removal of pavement, grading, and shallow excavation. Alternatives 16 and 20 would further exacerbate the extent and duration of these adverse impacts by raising existing railroad alignments along the left bank onto trestles through the LATC to connect the river channel and adjacent wetland areas. Alternatives 16 and 20 would also require the closure of the affected portion of the railroad line and rerouting traffic using this line, resulting in delays for both the rerouted rail traffic and for rail traffic on the lines to which traffic is rerouted. The Draft IFR concludes that such impact would be significant, "since it would be difficult to find sufficient capacity on other rail lines to reroute freight, passenger, and high-speed rail trains while the trestles are being constructed." (Draft IFR, p. 5-4). Additionally, alternatives 16 and 20 would require the permanent removal of spur lines and rail capacity.

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In addition to the specific traffic and circulation impacts noted above, the Draft IFR finds that all four action alternatives would also: (1) substantially and disproportionately affect low-income and minority populations by eliminating 157 well-paid blue-collar jobs from the LATC; (2) conflict with the Industrial land use designation of the rail yard, as well as specific goals and policies concerning industrial land uses in local plans; and (3) cause significant adverse impacts due to air pollution during construction, which would exceed state and federal thresholds for criteria pollutants.

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Ms. Josephine R. Axt  
November 18, 2013  
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Notwithstanding these adverse impacts, the Corps chose Alternative 13 as its “tentatively selected plan,” and the Los Angeles City Council voted to unanimously to support Alternative 20 on August 23, 2013.<sup>3</sup>

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### **The Draft IFR Fails to Provide the Necessary and Accurate Information Required for Informed Decision-Making Under CEQA and NEPA**

The Draft IFR does not adequately analyze all feasible project alternatives and the four action alternatives identified include unrealistic and unachievable conclusory assumptions about the feasibility of relocating the LATC. Additionally, the Draft IFR fails to properly consider the importance of the rail yard’s integral role in the national transportation infrastructure, effects on the human environment, and environmental justice and socio-economic factors. For these reasons, among others, the required analysis of the project is defective under CEQA and NEPA, thereby undermining reasoned judgment on the project and failing the required purposes of those environmental and information-gathering statutes. *See Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal. 3d 553, 564 (1990) (An EIR’s purpose is “to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR protects not only the environment but also informed self-government.”) (italics and internal quotation marks omitted); Cal. Code Regs., tit. 14, § 15002(a)(2); *see also Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989) (noting NEPA’s purposes are to ensure the agency will have detailed information on significant environmental impacts when it makes its decisions and to guarantee that this information will be available to a larger audience); 40 C.F.R. §§ 1502.1, 1502.14.

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#### **1. The Draft IFR does not adequately analyze all feasible project alternatives.**

The purpose of the alternatives discussion in an EIR/EIS is to identify ways to reduce or avoid significant environmental effects. For this reason, an environmental document must focus on alternatives that avoid or substantially lessen a project’s significant environmental effects and the alternatives discussed should be ones that offer substantial environmental advantages over the proposed project. *See* Cal. Pub. Res. Code § 21002; CEQA Guidelines § 15126.6(a)-(b); *see also* 40 C.F.R. § 1502.14(a) (NEPA requires the lead agency to “[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.”); 42 U.S.C. § 4332(C)(iii).

Here, the Draft IFR’s alternatives analysis fails in its attempt to address these CEQA and NEPA requirements. As part of the IFR process, the Corps used computer models to narrow down a list of 152 possible restoration plans to the four action alternatives identified in the Draft IFR. Initial plans were developed that excluded the LATC land parcel, but according to a mere one-sentence

<sup>3</sup> L.A. City Council Res. 10-0270-S3 (Aug. 23, 2013), *available at*

<http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=10-0270-S3>

<sup>4</sup> Hereinafter “CEQA Guidelines.”



explanation in the Draft IFR, these options were later eliminated because “they did not meet the restoration objectives for restored habitat and habitat connectivity.” Draft IFR, p. xxiv. The Draft IFR improperly rejected these alternatives without the reasoned explanation and analysis that both CEQA and NEPA require. Although habitat restoration objectives are an important component of the Draft IFR, without adequate analysis, they should not be pursued at the expense of significant adverse economic and social impacts expected to result due to the conversion of the LATC. For instance, the Draft IFR concedes, “[t]he long-term adverse impacts [of conversion] include the permanent loss of industrial land uses at [the LATC], the permanent closure of railroads and the resulting loss of rail capacity at [the LATC], and the loss of working class employment within the [LATC] neighborhood where minority and low-income populations will be disproportionately affected by that loss.” *Id.* at p. 5-126. Given that at least some of the “rejected” alternatives would minimize identified adverse environmental impacts, the Draft IFR’s dismissal of such alternatives is improper and deprives the public and decision-makers of vital information required for an informed analysis.

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2. The Draft IFR includes unrealistic and unachievable conclusory assumptions about the feasibility of relocating the LATC.

Although the Draft IFR states that the City will provide relocation assistance for the affected businesses per the Uniform Relocation Act of 1970, there is no potential “suitable location in the region” identified for the LATC, and therefore, resulting socioeconomic impacts stated in the Draft IFR are not less than significant. The LATC is the largest single-owner property adjacent to the Los Angeles River, and the rail yard location is the only place in the greater Los Angeles region where such a single, large-scale project is feasible due to space constraints, cost, and environmental considerations. In short, the construction of a suitable replacement yard elsewhere in the Los Angeles Basin is not realistic or feasible. The Draft IFR is flawed in its analysis because it fails to provide any evidence to support a contrary conclusion, although CEQA and NEPA require agencies to consider all substantial evidence when analyzing significant impacts and to consider impacts within the setting in which they occur. *See* CEQA Guidelines § 15064(f); 40 CFR § 1508.27(a)).

3. The Draft IFR fails to properly consider the importance of LATC’s integral role in the national transportation infrastructure, effects on the human environment, and environmental justice and socio-economic factors.

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NEPA requires a “full and fair discussion of significant environmental impacts” as part of an EIS. 40 C.F.R. § 1502.1; *see also* 42 U.S.C. § 4332 (C); 40 C.F.R. §, 1508.7. This includes analysis of both direct and indirect environmental impacts of the proposed action. 40 C.F.R. § 1508.8. Direct effects are caused by the action and occur at the same time and place. 40 C.F.R. § 1508.8(a). Indirect effects are those caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. *See* 40 C.F.R § 1508.8(b). Both include “effects on natural resources and on the components, structures, and functioning of affected ecosystems,” as well as “aesthetic, historic, cultural, economic, social, or health

[effects].” *Id.* (emphasis added). Not only does NEPA require that federal agencies explain and evaluate economic and social effects to the extent they are interrelated to the natural or physical environment (*id.* at § 1508.14), but federal agencies must also evaluate the extent to which a proposed action would have an adverse impact on low-income and minority populations (Exec. Order No. 12898).

Here, however, the Draft IFR does not adequately analyze or document the effects of the project on the LATC and the surrounding area, thereby ignoring significant environmental, economic and social impacts. Moreover, the Draft IFR fails to provide a factual basis for many of its most significant assertions and conclusions. Instead, when analyzing potential adverse impacts from each action alternative, and, in particular, foreseeable socio-economic impacts, the Draft IFR merely assumes that the “functions that occur at [the LATC], which are predominately intermodal freight transportation, would be replaced at a similar facility within the region.” Draft EIR, p. 5-109 (emphasis added). This sweeping assumption is premature and unsupported by substantial evidence.

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Likewise, any potential relocation of the LATC rail facilities will have dramatic effects on the larger national rail network and UP’s goods movement activities. Not only has no suitable replacement location for the LATC been identified, if an alternate site could be acquired, the intensive permitting timetable required for multi-year planning and design processes to allow a similar rail transit facility would take many years before construction could even commence. For example, according to data presented during the 2012 economic summit of the Southern California Association of Governments, the California Department of Transportation (“Caltrans”) reported that the average major transportation project in California takes 17 years to complete—one of the longest timelines in the country—and CEQA is often a major cause of such extended delays.<sup>5</sup> Such delays extend beyond transportation projects—the drafting of the Los Angeles River restoration project’s feasibility study and environmental process alone has taken over 7 years and is still not yet complete.

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It is also evident from the Draft IFR that low-income and minority communities in the area surrounding the LATC will disproportionately bear the brunt of adverse effects if the site is converted from industrial use:

Though rail and freight operations will likely be relocated to another location within the Los Angeles region, it is unlikely that the operations will be relocated near the communities in and around the ARBOR reach due to lack of a suitable alternative location and commuting to the new location may no longer be feasible for local residents. Working class jobs at [the LATC] may

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<sup>5</sup> M. Boarnet and W. Walrod, “Economic Benefits from Accelerating Transportation Infrastructure Investment” (Dec. 2012), *available at* [http://economy.scag.ca.gov/Economy%20site%20document%20library/2012EconomicSummit\\_BenefitsTransInvest.pdf](http://economy.scag.ca.gov/Economy%20site%20document%20library/2012EconomicSummit_BenefitsTransInvest.pdf). It should be noted that CEQA does not apply to most railroad-sponsored projects due to federal preemption.

be transferred-elsewhere in the Los Angeles regional economy . . . this may disproportionately affect the low-income and minority populations in and around the ARBOR reach study area if employees are from the communities in and around the current location and do not or are not able to retain their positions after the relocation of the facility to another location in the region. Indirect impacts may also occur to other businesses in the area that rely on clientele from the [LATC] workforce. [A]ny job growth predicted from urban renewal/redevelopment may not directly offset any initial job losses from closure of [the LATC] . . . and the specific skilled labor jobs at [the LATC] are not likely to be replaced in kind either during construction or over the long term. (*Id.*)

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In fact, however, because relocation in the Los Angeles region is infeasible, these jobs would not be relocated—they will be eliminated.

4. Until an Alternative Location for the LATC is Identified, and STB approval is Obtained, the LATC Should Remain Screened from the Project Area.

The Corps should revise the identified Draft IFR action alternatives to take into account these significant and adverse socioeconomic impacts. See 40 C.F.R. § 1508.14. Appendix H in the Draft IFR includes a list of eleven sites that were “screened from the Project Area” due to various urban land use constraints, real estate unavailability, high infrastructure costs, prohibitive costs associated with relocating and replicating current uses elsewhere, and/or their importance as recreational activities in the local community. These “screened” sites include, among others, the Department of Recreation and Parks Central Service Yard, the DWP/Main Street Facility, which includes rail tracks, the Metro Union Bus Service Yard, and the Area with Restoration Benefits and Opportunities for Revitalization (ARBOR) Outlet, which includes rail and roadway infrastructure. Notably, the Corps chose at least one site, the Central Service Yard, for the list because “no available parcel was identified that is large enough to accommodate the existing uses in one place, and the largest available parcels are not located in areas of the City that are as advantageously located . . .” Likewise, the Corps noted that for a number of other “screened” sites, restoration modifications were infeasible because of extensive rail infrastructure obstacles, complications with existing at-grade railroad tracks, and current and active rail uses. Based on the criteria identified in Appendix H, the LATC should also fall within the list of “screened” sites, at least until such time as a location of acceptable size and proximity is identified to facilitate relocation of UP’s operations. And as noted above, STB approval would be required for any such compulsory relocation.

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Ms. Josephine R. Axt  
November 18, 2013  
Page 8 of 8

For all of the reasons stated above, UP opposes the four action alternatives identified in the Draft IFR to the extent that they impact the LATC. In addition, a number of other individuals and organizations have submitted comments on the inadequacies of the Draft IFR, which relate to the topics discussed in this comment letter. Rather than restating all the same information and analysis, UP joins in those comments.

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An EIR/EIS must be recirculated when significant new information is added, including “changes in the project or environmental setting as well as additional data or other information.” CEQA Guidelines § 15088.5(a); 40 C.F.R. § 1506.9. The additional data and information that the Corps must provide to correct the deficiencies in the Draft IFR are significant. The new information may show that previously unanalyzed significant environmental impacts would result from the project, or that the severity of the identified environmental impacts would be substantially increased unless mitigation measures are adopted. These are all grounds for recirculation. See CEQA Guidelines § 15088.5(a)(1),(2); 40 C.F.R. § 1506.9. UP looks forward to an opportunity to review a substantially revised and recirculated Draft IFR.

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Thank you for the opportunity to express our views. Please forward these comments to the decision-making bodies of both the Corps and City before any action is taken by those respective bodies with respect to Los Angeles River restoration efforts.

Regards,

UNION PACIFIC RAILROAD COMPANY



Melissa B. Hagan

cc: Michael Steel, Morrison & Foerster



P 916 789 6015

March 28, 2014

Josephine R. Axt  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

**Re: Union Pacific Railroad Company's Comments to SPL-2013-003-NLH-Draft  
Integrated Feasibility Report for Los Angeles River Ecosystem Restoration Study**

Dear Ms. Axt:

This letter follows up on discussions we have had following Union Pacific's comment letter of November 18, 2013 concerning the above-referenced study. In that letter we explained that UP's Los Angeles Trailer and Container Intermodal Facility ("LATC"), a 120-acre intermodal facility handling approximately 240,000 cargo containers per year, currently operates at near fluid capacity and is a key component of our national network. UP has no plans to relocate or close this facility, and is in fact planning a major modernization in the near term. Accordingly, UP stands by all of the issues raised in that letter and we understand that the Corps of Engineers will respond to them as it concludes the study process.

However, UP has a long history of working cooperatively with the City of Los Angeles on a wide variety of matters. It is possible that, 20 years or more in the future, a sale or exchange agreement could be reached, but only if, on terms acceptable to UP management in its sole discretion, the City acquires, in cooperation with UP, a suitable replacement facility with all necessary permits and approvals for UP to use as a rail yard comparable to LATC in terms of capacity, function and compatibility with the UP system and customer needs.

Please note that nothing in this letter or any comments by UP should be construed as in any way limiting or waiving any legal rights, protections or defenses UP may have, including federal preemption.

Please let us know if you have questions about this letter.

Sincerely,



Scott D. Moore

cc: Honorable Eric Garcetti, Mayor, City of Los Angeles  
Mr. Guy Lipa, Associate Director, City of Los Angeles  
Mr. Michael J. Steel, Partner, Morrison Foerster  
Ms. Melissa B. Hagan, Sr. General Attorney, Union Pacific



**From:** [Meredith McKenzie](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@foliar.org](mailto:contact@foliar.org)  
**Subject:** [EXTERNAL] Los Angeles River ARBOR Study Comments  
**Date:** Monday, November 18, 2013 1:50:18 PM

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Dear Colleagues:

i am pleased to submit these comments on behalf of the Urban Rivers Institute (URI) relative to the USACE's current Los Angeles River ARBOR Study and recommended alternative.

The Army Corps is to be commended for its detailed research and study of the ecosystem and habitat restoration potential of the Los Angeles River as well as its support for an alternative that will help return one of America's urban rivers to natural hydrologic functioning.

Nonetheless, the Army Corps' preferred Alternative 13 falls short in addressing the complex issues and needs in maximizing restoration opportunities in the Los Angeles River.

The Urban Rivers Institute strongly urges the Army Corps to revisit its evaluation and to recommend Alternative 20 as its preferred alternative for restoring one of America's great rivers.

URI supports Alternative 20 for a number of reasons:

1. It is the only alternative that addresses restoration at two major tributary confluences. These habitat restorations are vital in the long term to ensure complete Los Angeles River Watershed health.
2. It is the only alternative that includes the vitally important Piggyback Yard, one of the last large scale contiguous land areas within the Los Angeles urban core that can be preserved and protected along the Los Angeles River Corridor.
3. It is the only alternative consistent with the goals and mandates of related federal programs, specifically the Great American Outdoors Initiative and the Urban Waters Partnership. The Army Corps' final recommendation of Alternative 20 will send a loud, positive message that USACE values and respects its federal partners, while reinforcing its historic role as the protector of America's navigable waters.
4. It is the only alternative that offers a sweeping vision for the next century - a vision that will protect and restore the maximum amount of habitat and riverine corridor along the Los Angeles River.

In essence, Alternative 20 is our only hope for best practices in championing the rebirth of the Los Angeles River into the 22nd Century. The fact that the Army Corps included Alternative 20 among its options is strong evidence that the Corps already recognizes that Alternative 20 is truly the best option for this exciting, complex restoration that will become a global showcase for inter-agency cooperation, public-private partnerships, and world-class greening of a major historic river because, after all, Los Angeles is as much an international city as it is an American one.

With virtually unanimous local partner support for Alternative 20, whose members have committed to bringing extensive matching financial and in-kind resources to make this plan a reality, Alternative 20 is the *only* ARBOR Study option that will ensure that Los Angeles' future will start in the riverbed and face outward to the future.

URI recommends, without reservation, that the USACE adopt Alternative 20 of the Los Angeles River ARBOR Study.

Thank you very much for giving us the opportunity to comment on this exciting and bold river restoration initiative.

Best,

*Meredith*

**Meredith McKenzie**  
**President**

**URBAN RIVERS INSTITUTE**  
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**Facebook:** [www.facebook.com/arroyolover](https://www.facebook.com/arroyolover)

November 24, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District;  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, California 90053-2325

The Urban Waters Federal Partnership in the Los Angeles River is pleased that USACE is set to move forward on the Los Angeles River Ecosystem Restoration Integrated Feasibility Report (ARBOR Study), and appreciates the opportunity to share comments about the three "best buy" alternatives that have been considered by the Corp, including the tentatively selected Alternative 13. The areas within consideration by all of these alternatives - including the more extensive Alternative 20 - have been designated as being high priority for revitalization among the 44 member organizations of the Los Angeles River Partnership, including the 9 federal partner agencies that actively participate.

In 2011, the US EPA brought together 12 (and later 13) federal agencies that shared the vision to revitalize urban waters and the communities around them – “transforming overlooked assets into treasured centerpieces and drivers of urban revival.” On June 24, 2011 USACE Assistant Secretary Jo Ellen Darcy along with her colleagues in agencies that represent federal priorities ranging from conservation of natural resources to transportation infrastructure signed a commitment to form the Urban Waters Federal Partnership – in part to “break down government program silos and to ensure that our collective efforts will reverse past neglect, energize existing programs and engage new partners.”

The Los Angeles River was designated later that year as one of the original Urban Waters location as a result of the strong collaboration of local stakeholders, the readiness of local government partners such as the City of Los Angeles to undertake the revitalization work, and the timing of key federal activities such as the ARBOR Study to support this work. The USACE local district staff has been full partners in the LA Partnership and has worked closely with stakeholders to bring ARBOR to this critical juncture. Accordingly, stakeholders are excited that nearly a decade from when the ARBOR Study was just a hope, we stand at the precipice of USACE setting the cornerstone for the implementation of so many other revitalization projects.

While there are many projects in which this description may seem to be hyperbole, the impact that ARBOR has on a full docket of federally-engaged or funded projects cannot be overstated. The Urban Waters Federal Partnership supports USACE’s leadership in boldly advancing revitalization of the LA River. In corroboration with its Urban Waters LA River Workplan, the LA River Partnership would like to offer some comments that point out why the three Alternatives leverage the success of Urban Waters – and particularly from a broader perspective, why Alternative 20 provides opportunities not shared by the other Alternatives to achieve the outcomes that the other federal agencies are seeking.

We support USACE in considering the requests that have been made by various Los Angeles stakeholders to permit an allowance for a more progressive plan be approved |

if other sources of funding can be obtained. We would also request USACE consider the possibility of including an Adaptive Management Plan that would allow the City of Los Angeles the capacity to evolve the project according to resource availability.

1

### ***Federal Government – Working in Concert***

Since Results Oriented Management practices were formalized in the 1990s, each of our federal agencies has been scrutinized for efficiency and the ability to deliver clear program outcomes. In an era where increased government need is inversely met with a decreasing pool of resources, the program performance of our federal partners is directly connected with that agency's ability to work in concert with other stakeholders, be engaged with local needs, and importantly - creatively find ways to leverage public investments from local, state and even other federal sources.

As a founding member of Urban Waters, USACE understood that the goal of revitalization urban waterways was a multifaceted endeavor; no one agency held all the tools or resources to bring about this goal, but yet each held pieces of expertise or resources that when leveraged with each other could produce results greater than the sum of its parts. The Urban Waters Program, itself, was designed to leverage US Department of the Interior's America's Great Outdoors program, and compliment the Federal Partnership for Sustainable Communities.

*America's Great Outdoors Initiative:* "...21<sup>st</sup> Century conservation and recreation agenda...reworking inefficient policies and making the federal government a better partner with states, tribes, and local communities."

*Federal Partnership for Sustainable Communities:* "Three federal agencies came together ...help places around the country develop in more environmentally and economically sustainable ways. To guide its work, the Partnership developed six livability principles: Provide more transportation choices; Promote equitable, affordable housing; Enhance economic competitiveness; Support existing communities; Coordinate and leverage federal policies and investment; Value communities and neighborhoods.

Among these initiatives and many others, there is a consistent theme of locally-driven priorities, cooperation, not bureaucracy across agency lines, and efficiency with federal investment. That USACE and many of its federal agency partners can work with and between these initiatives showcases government efficiency; efficacy, however, remains the true test – achieving individual program success through collective and strategic effort.

### ***Leveraging Federal Investment***

In the ARBOR Integrated Feasibility Report, it is clear that cost-benefit analysis is critical to the selection of Alternatives 13, 16 and 20 – each demonstrating a “best buy” for the work prescribed. The straight metric of cost per acre of restored ecosystem seems to be a direct way of assigning a value to restoration – and Alternative 20 has not been preferred because of its apparent high cost compared to the other Alternatives. This model, however, seems inadequate in measuring the outcomes for the level of place-based, leveraged and sustainable environmental return

2

that the Federal Government is seeking; the analysis stops short of developing a Return on Investment that captures benefits for all of the federal partners that have a stake in the revitalization of the LA River. This model, which has served USACE well with projects in less urbanized areas, seems insufficient to capture the full value of conserving prime urban land for ecosystem restoration: of relative scarcity of land (and thus a high cost), the environmental and logistical complication and expense of any modification to Los Angeles' current landscape, and the inherent cost of gaining an opportunity for a land use that normally cannot compete with usual urban market forces. In addition, several other elements should be included as valid consideration to the cost-benefit analysis, whether these costs are to be borne by federal or local funds.

2

- *Land and land related costs:* Land values in the City of Los Angeles are among the highest across the nation, and there is great private and public pressure to intensify development (Los Angeles is highest in property taxes nationally for most populated areas – CBSNews, May 2011). According to a CNNMoney report (November, 2013), Los Angeles is the second most unaffordable housing market in the country, underscoring the cost of property in Los Angeles and the premium placed upon any undeveloped land. In addition to the higher cost for acquisition, the entitlement processes, clean up and the logistics of restoration will be commensurate with these higher land costs. The City of Los Angeles, as sponsor, has acknowledged this and has agreed to pay for a large share of these costs. These factors are unfortunate, but reasonable in the context of location, and the cost analysis should be scaled accordingly.

3

- *Land Benefits:* The Federal Reserve Board of Washington, DC report, “Commercial and Residential Land Prices Across the United States” notes that values on or near undeveloped land, in particular, on average are higher because of the speculation around future development (Nichols, Oliner, Mulhall; 2010-16). To be considered is the positive impact restored areas will have on the property values in some of the neglected and frequently blighted areas. The Verdugo Wash area, in particular, will experience a change in land use but in many instances lose substandard infrastructure, obsolete industrial capacity and dirty processes; this may catalyze redevelopment in surrounding areas – inviting cleaner and progressive commercial and industrial businesses to both the Cities of Los Angeles and Glendale.

4

- *Competing Municipal and Regional priorities:* The history of Los Angeles is a story of massive public works to control, rather than coexist with that which is natural; this trend continues today with massive infrastructure projects that challenge the residents of Los Angeles to find a way to balance the benefits of large-scale development with securing illusive green space. Examples that continue to present a juggling act in Los Angeles are the transportation-related projects such as the \$1.5 billion California High Speed Rail, expansion of existing freeways and Interstates, the growth of Los Angeles Union Station to accommodate the HSR and projected growth in regional rail usage. With a growing demand from residents to reclaim the Los Angeles River for public access and natural restoration, there has been a change in focus – a shift or perhaps a sharing of priorities. Restoration must be evaluated from this

5



benefits paradigm – that each acre “reclaimed” for restoration is a hard-fought, extremely valuable and unique opportunity.

- *Per Capita Benefit:* Analysis of habitat units is a useful gauge of restoration progress, but does not capture the benefit of an incrementally more robust habitat for the human population of Los Angeles. A healthy ecosystem must include benefits for all members of the environment, and the opportunity to improve the human condition through health, recreation, increased economic investment in the areas should be included in a multi-benefit model. The hundreds of thousands of residents that live in densely urban, green space-poor communities divided by rail and infrastructure and barred from the River - the linear park on the other side of barbed wire fencing running behind their homes. USACE and the City of Los Angeles have an opportunity to not only enhance habitat corridors for fish and wildlife in the Glendale/Verdugo area to Griffith Park, and Piggyback Yard to Cornfields/Los Angeles State Park, but to build corridors for these communities to access these natural areas.

6

### ***Keystone Effect and Connecting Federal Priorities***

The Urban Waters Federal Partnership has focused its coordination of federal engagement to produce tangible outcomes on high priority revitalization efforts related to the Los Angeles River. The Partnership has brought the ARBOR Study into the national spotlight, and has been recognized as an exceptional opportunity to bring about significant momentum in the Urban Waters goal of revitalizing urban waterways. This Workplan of federal priority projects includes several projects with extensive revitalization work predicated on the ARBOR Study, and in particular - the expanded reaches of Alternative 20.

*Verdugo Wash + Glendale Riverwalk:* The restoration of the Verdugo Wash is key in anchoring the investment that the City of Glendale has made in restoring the LA River frontage in its City. Past ecosystem restoration efforts by the City of Glendale have conflicted with USACE invasive plant maintenance activities in that there were no areas with clear designated for ecosystem restoration. With the opening of Glendale’s Riverwalk and impending plans (Phase 3) with the City of Los Angeles to connect Riverwalk with natural and recreational uses in Griffith Park through bridges, this area will benefit from the establishment of ecosystem designation. While the City of Glendale has assembled some of the resources for this phase, both cities have planned to use the ARBOR designation to leverage additional funds from the US Department of Transportation.

*Piggyback Yard + Cornfields/Los Angeles State Park :* Acquisition and restoration of Piggyback Yard is considered by many stakeholders as one of the crown jewels of LA River ecosystem and restoration and storm water management. The yard is surrounded by some of the oldest and culturally significant neighborhoods in Los Angeles, and still home to diverse and often disadvantaged communities that have accommodated the rail, salvage and other industrial uses that pervade the area. The size, shape of the property and its proximity to the only other municipal green spaces throughout this historical core such the hard-won Cornfields/Los Angeles State Park make Piggyback Yard a lynchpin to completing the “archipelago” of green space and restoration from Glendale and Griffith Park through the La Noria/Water Wheel

project currently under construction and Cornfields. The LA Partnership was very concerned that state and local investments that would total billions of dollars in these projects would not connect. It is clear how the cost of this piece would skew the cost of Alternative 20 high, but the leveraging opportunity is significant. We have received great interest from the financial community in developing a strategy to raise private funding, but even this effort would be moot without inclusion of this piece in the final selection.

*High Speed Rail Engagement:* The current proposals for the extension of the bullet train/High Speed Rail cross and impact the LA River at several points starting at the River headwaters north of the ARBOR area. In the Study area, however, the level of potential impact increases exponentially as the only alternatives cross through, over, or under many ecological sensitive areas. The US EPA has maintained close involvement in the project, and through Urban Waters has included the California HSR Authority as a partner at the table to facilitate coordination and communication. While several Urban Waters Workplan projects are impacted by the proposals, the ARBOR Study will provide a formal placeholder or buffer to enable the HSRA to create alternatives that will accommodate the River priorities. The Verdugo Wash is particularly sensitive to having this placeholder.

*Greenway:* There are several projects in the Workplan that are including greenways or passive recreation stretches as part of their restoration or revitalization plans; moreover, one of our partners has developed a project that will connect a greenway throughout all 51 miles – including the Verdugo and Cornfields stretches in Alternative 20. Their funding strategy largely depends on having the ARBOR designation which will leverage other federal funding sources.

As we hope to have articulated through our comments, all proposed work in the three alternatives represent a greatest opportunity for revitalization of the Los Angeles River, but perhaps Alternative 20 more fully aligns the billions of dollars of federal investment that has been or is in the process of being invested into other aspects of River and River-community revitalization. This is a unique moment in both environmental restoration and in sustainable land use planning, and we encourage the Corp to set a foundation for decades of sound federal, as well as local investment.

Respectfully,



Pauline Louie  
Watershed Ambassador  
Urban Waters Federal Partnership  
Los Angeles River Pilot

Appendix A: Federal Engagement in LA River Revitalization

Appendix B: Urban Waters LA River Workplan\*

Appendix C: List of New Projects for Consideration into Workplan

\*As of current date, Workplan is being modified to include the new projects

# Urban Waters Partnership - LA River Workplan Project Status

## Workplan Projects within the City of Los Angeles

TYPE	PROJECT	LOCATION	LEAD	STATUS/BENCHMARKS
Capacity/Planning	LA River Corps	LA-wide	LA, Conservation Corps	Permanent Strategy for federal engagement not yet identified.
Capacity/Planning	NELA Sustainability Challenge Grant	Glendale Narrows	HUD, LA-CDD, LA-Planning	Summer Policy Forums concluded; processing feedback
Feasibility Study	LA Basin Stormwater Conservation	LAR+Ballona+San Gabriel watersheds	USBoR, LACFCD	Finalizing scoping: 2 year project
Feasibility Study	LA River Ecosystem Restoration (ARBOR)	11m; Headworks to Downtown	USACE, LA-Eng	Final selection of Alternative #13 vs. #20. Ongoing public comment until Nov 18.
New Constr/Rehab	North Atwater Crossing/La Kretz Bridge	N. Atwater Park to Griffith Park	USACE, NPS, LARRC	Groundbreaking scheduled for late Spring '14; CEQA adopted, USACE wrapping up NEPA.
Study-Other	Indicators of Watershed Health	complement Arroyo Indicators report	CWH, EPA	Presenting at WaterSmart Innovations (Las Vegas); also at 10/10 Watershed event.
New Constr/Rehab	Pacoima Wash Greenway	Pacoima Dam-Pacoima Wash/Tujunga	MRCA, USACE	Full Greenway -Bikeway (partial funding) in design
Study-Other	Station Fire Restoration/Research	Headwaters	USFS, National Forest Foundation	LA Center for Natural Resources to open (w/ LA City); coordinator hired
Feasibility Study	Arroyo Seco Watershed Ecosystem	Angeles NF-Confluence	USACE, LACFCD	Moving Forward - USACE funding allocated.
Feasibility Study	Headworks Ecosystem Restoration	Forest Lawn Dr	USACE, FOLAR, USFWS, LA DWP	Currently building reservoir; restoration phase alternatives being considered
Feasibility Study	Sun Valley Watershed	2,800ac	LACFCD, USACE	F3 (Existing Conditions) done, discussing F4 w/ "333" model. Strathern Wetland is flagship project (LACo, LA City, DWP) at 60% design.
Study-Other	River Forecast Site	Downstream, near Downtown LA	NWS, LA, USACE, LACFCD	Site selection complications. Exploring alternatives for collecting/disseminating info.
Feasibility Study	Sepulveda Basin Concrete Removal	Upstream of dam; NW of 405/101	USACE, River Proj	Moving Forward - USACE funding allocated.
Demonstration	LA River-Bowtie (G1); Demo Project	Bowtie/G1 in Taylor Yards	USACE, LA-Eng, CA Parks	Concept plans being reviewed; awaiting additional funding.
Study-Other	Taylor Yard-G2 Acquisition	G2 Parcel	LA, LARRC, USACE, MRCA	Project Inactive; land acquisition negotiations ongoing

# Urban Waters Partnership - LA River Workplan Project Status

TYPE	PROJECT	LOCATION	LEAD	STATUS/BENCHMARKS
Los Angeles County Workplan Projects Outside of City of Los Angeles				
New Constr/Rehab	Parque Dos Rios/Southgate Park	7.6+ac; 710-LA River	NPS, South Gate, RMC	Design finished; construction underway?
Feasibility Study	E. San Pedro Bay Ecosystem Restoration	LA/San Gabriel rivers; between LA/LB ports	USACE, Long Beach	Council approved staff to revise 333 budget with USACE; still seeking funding from USACE.

Current Partnership Engagement Issues				
Engagement	High Speed Rail - Palmdale to LA	SF Valley to Union Station	EPA, DOT	Ongoing discussions; reviewing alternatives, identifying potential conflicts with UW projects.
Engagement	710 Expansion	South of Downtown LA	EPA, Metro, DOT, Gateway Cities, LA, FOLAR	Design Revisions.

Completed Projects				
New Constr/Rehab	Hansen Dam Campground (Tujunga Wash)	Tujunga; 1m down Little/Big Washes	USACE, LA-Parks/Rec	Open to the Public; Project in Post-Construction
New Constr/Rehab	SouthLA Wetlands Park	5413 Avalon Blvd	LA, EPA, Water Quality Control	Open to Public in Feb 2012; post-construction
Restoration	North Atwater Creek	3900 W. Chevy Chase Dr. , LA	LA, EPA, Water Quality Control	Opened to the public in Apr '12.
Restoration	Tujunga Wash Greenway	9ac Valley Glen near Sherman Wy	LACFCD, USACE	Open to the Public in Aug '12.
Regulatory	LA Co Municipal Separate Storm Sewer System (MS4) Permit Renewal	County-wide	Water Quality Control, EPA	LARWQCB renewed permit on 11/18; addresses muni stormwater discharges in LACo (except Long Beach).
				Project Completed
				Recent Project Activation
				Project On-Going
				Project Waiting/Pending



## Urban Waters Workplan Timeline & Major Milestones

[illegible]

# Urban Waters Workplan Timeline & Major Milestones

[illegible]

## Urban Waters Workplan Timeline & Major Milestones

[illegible]

**Urban Waters Federal Partnership- Los Angeles River Work Plan**  
**August, 2013 Ballot**

Project	Organizations	Description	Expected Completion Date	Milestones	Promotes Clean Urban Waters	Reconnects people to their waterways	Promotes water conservation and reduces reliance on imported water supply	Uses urban water systems as a way to promote economic revitalization and prosperity	Encourages community improvements through active partnership	Promotes Ecosystem Restoration	Fosters long-term environmental stewardship	Clear federal involvement	Major support funding
River Rover	FQAR- contact Shelly Backler	Mobile exhibit to provide information/education to residents and visitors; includes informative displays with video, interactive educational signage and opportunities for lab analysis with scientific equipment.	January of 2014	1. River Rover assembly completion (Jan 2014) 2. Program upkeep	River Rover will regularly complete water quality tests	River Rover provides an opportunity for community especially schools to engage through education	Educates on the importance of water conservation		Opportunity to partner with schools, nonprofits, etc. surrounding the LA River.		River Rover helps teach values of our urban ecosystem through hands on engagement.		
Arroyo Seco Canyon	Arroyo Seco Foundation- contact: Jonathan Fratta	This is a partnership between Pasadena Water and Power and the Arroyo Seco Foundation. Arroyo Seco Canyon Project (ASCP) is a water resources enhancement, habitat restoration, and recreation improvement project funded by the state integrated regional water management program and Pasadena Water and Power.	Construction Begin- October 2014. Complete: October 2015. (construction will take place only a few months at a time as a result of restrictions on construction work in the Arroyo Seco River. The project will also enhance the riparian habitat of the Arroyo Seco River.)	1. Water resource enhancement, 2. habitat restoration, 3. recreation improvement project	Enhanced water quality	Public recreation will be enhanced and increased along the Gabrielino Trail, and thus throughout the Angeles National Forest.	This project promotes water conservation as a major component of a comprehensive plan. Depending on rainfall conditions, will increase Pasadena's local water supply by up to 3000 acre feet per year.	Will increase awareness of urban streams and their potential for recreation by LA Metro Area residents. Additional improvement to the Arroyo Seco Parks system, providing active and passive recreation opportunities from the AS to the Angeles National Forest.	Habitat will be greatly enhanced, though the greatest habitat benefits will lag behind completion by 2-3 years.		Major cooperation with the US Forest Service is necessary for successful completion of this project.		Pasadena Water and Power
Glendale Riverwalk II & III	City of Glendale, NE Trees, City of LA- contact John Pearson	Most of the Phase II trail extension is already built. The work starting now will add a small bridge connecting Phases I and II, an entry plaza with a river overlook where the two phases join, a park at the Verdugo Wash Confluence with the Los Angeles River, and additional interpretive signage. Phase II is scheduled for completion at the end of 2014.   The Phase II work that is presently funded includes site selection and preliminary engineering for the Los Angeles River bridge that will connect Riverwalk to Griffith Park. Construction of the bridge is not yet funded. Site selection will focus on four alternative locations identified in the Phases II/III Master Plan, and will obviously involve significant coordination with the City of Los Angeles. Phase II site selection and preliminary engineering are also scheduled for completion at end of 2014.		Phase I completed 2013. 134 Freeway alignments to be done early 2014 as part of phase 2. plans to integrate Verdugo wash also phase 2. Phase 3 includes bridge connecting Griffith park on LA City side, develop/select designs 2014, seeking US DOT funding.		Improving passive recreational opportunities, and trails for bicyclists and pets	Yes - community/econ dev; connection to LA City as a recreational corridor		Work with Residents and local studios/businesses; partner with City of LA				CA Rivers and Parkways, LA Co Regional Parks/Open Space, Caltrans. Seeking DOT funding.
Bending the River Back into the City	Metabolic Studio- contact Mark Hanna, Michael Gagan	The project will divert water from the LA River, lift the water by use of a water wheel, treat the water through filtration and UV disinfection, and distribute the water for landscape irrigation use, offsetting nearly 80 AF of potable water demand per year. The diversion requires a 6-foot-high, computer-controlled inflatable dam to be installed in the LA River dry season flows will be captured and pooled water will extend approximately 1.2 miles upstream, creating a surface environment of approximately 16 acres. The project will also enhance the riparian habitat of the LA River, allowing stormwater flows to pass unimpeded. When the dam is raised, pooled water will be diverted through a side channel bored into the west bank of the river, immediately upstream of the dam. The side channel will direct LA River water to the water wheel, which will be powered entirely by the force of the diverted LA River flows. A small portion of these flows, approximately 80 gallons per minute, will be raised from the inlet tunnel in buckets attached to the wheel. These buckets will lift the water approximately 60 feet and empty it into a collection trough. The collection trough will convey the water under gravity to storage tanks, which will connect to a treatment and distribution system.	2015	1. CEQA, 2. 100% designs, 3. property acquisition, 4. groundbreaking in 2014	This project will capture, treat, and use dry weather flows in the LA River.	Yes, focused installation to attract people to the LA River and to reconnect the River to the City.	Yes, will irrigate State Park, other local parks, and supply a distributed system of cisterns	The project will reinforce the historic concept of using the LA River as a resource instead of a trash and runoff collection area. It is anticipated that the wheel itself, combined with recent land use designations adopted by the City, will result in significant residential and commercial growth in the area.	All end-users will have the benefit of the water produced, treated and delivered by the project by virtue of partnerships with Metabolic Studio.		As well, there will be a significant educational component to the project that will stress the importance of reducing urban stormwater runoff.	Regulatory Clearances	Metabolic Studios
Compton Creek	Coastal Conservancy- David Hayes	The Coastal Conservancy will soon take on the next steps to advance detailed technical and habitat work in the eastern bottom creek. The project will also enhance the riparian habitat of the LA River, allowing stormwater flows to pass unimpeded. When the dam is raised, pooled water will be diverted through a side channel bored into the west bank of the river, immediately upstream of the dam. The side channel will direct LA River water to the river wheel, which will be powered entirely by the force of the diverted LA River flows. A small portion of these flows, approximately 80 gallons per minute, will be raised from the inlet tunnel in buckets attached to the wheel. These buckets will lift the water approximately 60 feet and empty it into a collection trough. The collection trough will convey the water under gravity to storage tanks, which will connect to a treatment and distribution system.	11/14	CEQA/NCEPA review ready (30% site plans)	yes	yes	within project area	yes	yes- lots of areas for collaboration			maybe- Small green infrastructure projects need to be planned from a quantifiable and cumulative impact approach of several projects, in order to achieve local, county, and state support.	
LA River Expeditions	George Wolfe			not a distinct product	promote clean urban waters	reconnecting people to their waterways	Education through paddling programs	Yes - encourage recreational use; small business	partnership with LACC, MRCA, City of LA, USACE, River Project, Urban Semillas, FoLAR			yes	
Certification of Juan Bautista de Anza National Historic Trail	NPS- Anne Dove, Patrick Johnson	Certification of Juan Bautista de Anza National Historic Trail: Continuous Recreational Trail	late 2013	Completed NPS Application Process		Yes- the historical trail provides additional room for engagement		Yes- by providing National Park Service Trail Certification to the Rec Trail				Yes- NPS	Yes- NPS

**Urban Waters Federal Partnership- Los Angeles River Work Plan**  
**August 2013 Ballot**

Project	Organizations	Description	Expected Completion Date	Milestones	Promotes Clean Urban Waters	Reconnects people to their waterways	Promotes water conservation and reduces reliance on imported water supply	Uses urban water systems as a way to promote economic revitalization and prosperity	Encourages community improvements through active partnership	Promotes Ecosystem Restoration	Fosters long-term environmental stewardship	Clear federal involvement	Major support funding
LA River/Aliso Creek Confluence Project: Recreational Trail and Confluence Park	Robin Mark/Tori Kier - TPL	Development of 2 ac park, 1.5 mi bike/jed path, public art, green streets BMPs in low-mod income area of Reseda. Land owned by DWP, LACoPW.			Yes - Green Street	Yes-active and passive recreation	Yes - Green Street		Community Engagement with residents; strong local support			\$255K in CD86 leveraged with State and private funds. Needs completion of bike path.	
Greenway 2020: Connect 51 miles of bike/pedestrian paths for recreation and commuting trail"	Omar Brownson/Ja Sanson - LARBC	Initiative to connect all 51 miles of LA River with a bike and pedestrian trail.	2020		Yes - Green Street	Connects the community to the river with an adjacent path for recreation and commuting.		Greenway 2020 is part of a larger economic development strategy. Greenway creates a nonmotorized transportation corridor, safe route option, and provides open space in underserved neighborhoods			Reconnecting Angelenos to the LA River for their recreation and education will foster ownership and environmental stewardship.		
Vets' Memorial Garden	City of LA, LACC	Development of community garden on Army National Guard Armory land facing LA River in Van Nuys. Memorial to Vets, and provides connection along LA River to nearby rehab and vets facilities.				Yes - passive engagement with River; would connect bikeway			Active partnership with US Army, Operation Gratitude			Seeking engagement with VA and alternative transportation funding.	
Safe Routes to River	RTCA, MRCA, LAUSD	The Safe Routes to the River project is a pilot effort between the National Park Service's Rivers, Trails, and Conservation Assistance program, MRCA, and LAUSD to develop a suite of Implementation strategies and recommendations for establishing safe physical connections between LAUSD school sites and the Los Angeles River. The Safe Routes project will focus on assessing conditions and engaging students at four identified school sites along the river (Caroga Park HS, Reseda HS, John Marshall HS, and the LA River School at the Sonia Sotomayor Campus) to explore strategies and identify opportunities for increasing access to the river and the natural environment. This project will provide educational and interpretive facilities which improve opportunities to connect classroom curriculum and school-based activities to the natural environment.											
LA River Greenway Tree-Planting & Trail	Community Conservation Solutions	Bridge gap in trail and connect to river public access parking garage. Located on Goldwater Canyon Ave to Whitsett Ave, San Fernando Valley. Concept and design phase; ongoing public outreach; three grants recently awarded; seeking remaining funding; permitting, construction 2014-2016.	2016	trail improvements		Yes- improves access to river		yes- promotes activity along the river	yes- improving public access to and safety on river/trail			Yes- USACE	



# ARBOR Study – LA River Project Connectivity

## Arbor Study Zone Projects

### **North Atwater Crossing/ La Kretz Bridge-**

Multimodal crossing bridge funded by private investment - symbol of river development in ARBOR Study zone. Part of connectivity of Greenway bike/ped paths.

### **Headworks Ecosystem Restoration-**

Development of riparian habitat and wetlands, water quality improvement and passive recreation elements.

### **Bowtie Parcel: Demonstration**

#### **Project-**

Implement restoration plans of ARBOR Study; streams, wetlands, river bank terraces.

### **NPS Certification of de Anza Historic Trail-**

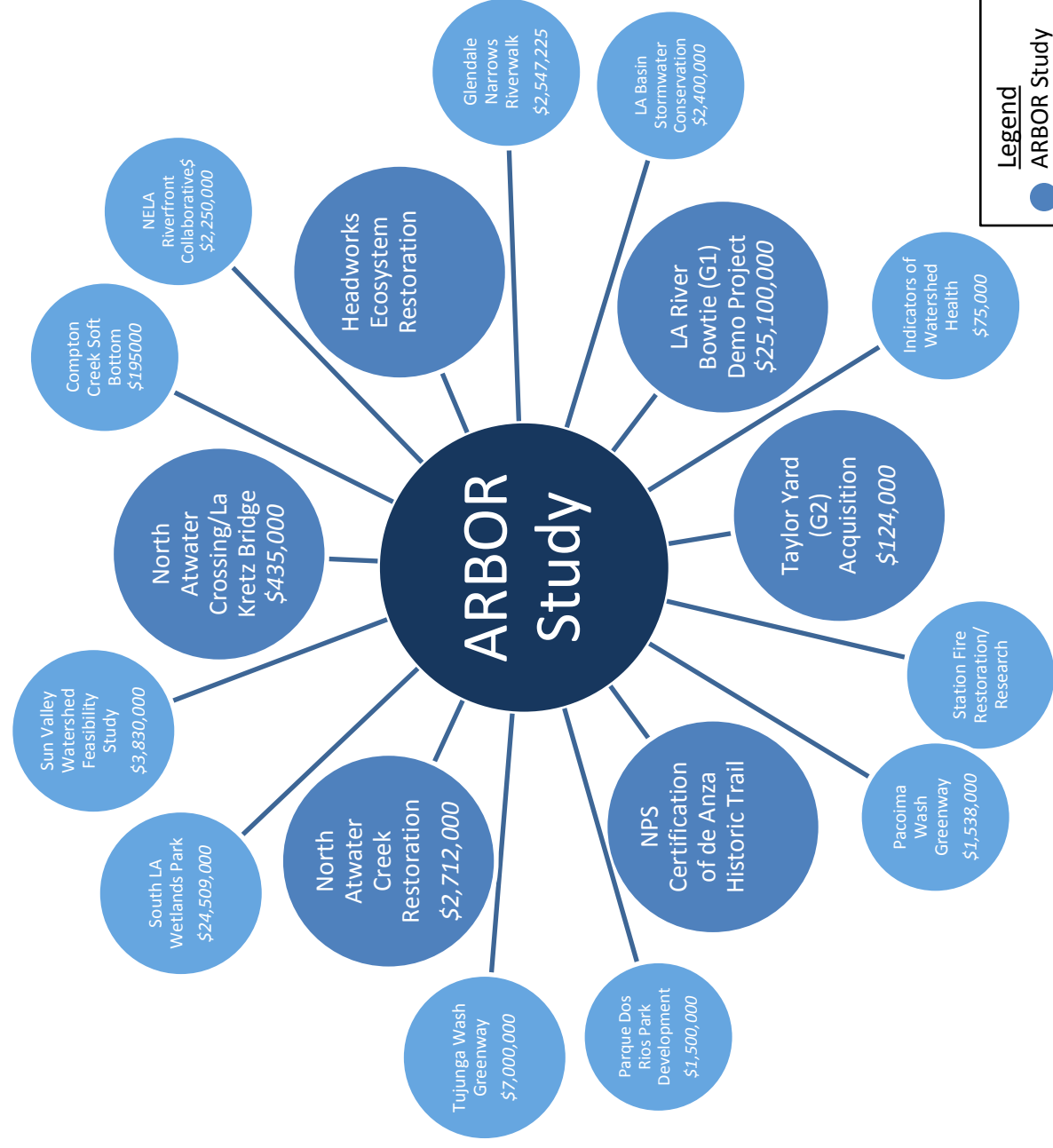
Certification of historic trail follows LA River and promotes awareness of recreational corridor.

### **North Atwater Creek Restoration and Park-**

Restoration includes native vegetation, stormwater infiltration, debris catchment before LA river. Recreation and entry point for bike/ped path along River.

### **Taylor Yard- G2 Parcel Acquisition-**

Acquisition strategy for "crown jewel" property in ARBOR Study zone, currently held by private railroad interests.



# USC School of Architecture

November 16, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

I am writing to encourage adoption of Alternative 20 as the fundamental long-term future of the Los Angeles River and its adjacent urban valley. I am the Director of the Discipline of Landscape Architecture at the University of Southern California. I am a former Dean of the USC School of Architecture and have been engaged with Los Angeles River studies since the early 1980's. Our program recently mounted a Los Angeles River Exhibition at City Hall. The focus of our graduate studies is the urban landscape with particular attention to landscape infrastructure.

I have rather thoroughly reviewed the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report. I have discussed it with our landscape ecology faculty as well as other faculty who are expert in landscape infrastructure design. I am providing comments in support of Alternative 20 presented in the document.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare, Draft Integrated Feasibility Report. The Tentatively Selected Plan, while including initiatives of importance to the future of the River and its environs does not go far enough to incorporate both near-term actions and long-term ecological recovery and high quality.

All large scale landscape infrastructure planning and implementation studies inherently cut across not only ecological, but also cultural, economic, social and ethnographic conditions and futures. Matters that are not considered do not disappear but simply continue to be deficient or in disarray. Alternative 20 comes very much closer to the necessary inclusivity of our current opportunity than Alternative 13. It should be chosen, implemented, and then over the years further augmented. I agree with the following assessment being communicated to you by numerous other individuals and organizations:

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)

University of Southern California

Watt Hall 204, Los Angeles, California 90089-0291 • Tel: 213 740 2723 • Fax: 213 740 8884 • <http://arch.usc.edu>

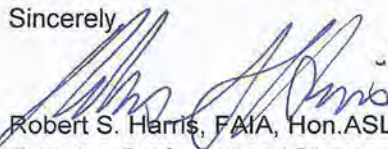




- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7,015 more jobs and \$386 million more in wages during construction
  - Creates 3,700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1,094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas essential to improve air quality

Substantial restoration of the Los Angeles River is crucial to City and the region. The added costs for Alternative 20 represent the additional wise investment required to achieve of the objectives stated above that were not sufficiently counted in the report comparisons. I strongly urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,



Robert S. Harris, FAIA, Hon.ASLA  
 Emeritus Professor and Director  
 Discipline of Landscape Architecture  
 ACSA Distinguished Professor



# USC School of Architecture

Sunday, November 17, 2013

Josephine R. Axt. Ph.D.: Chief Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt

I am writing comments for the ARBOR Study to suggest that the Army Corps should strongly reconsider their recommendation of Alternative 13 and select Alternative 20 as their recommended alternative.

1

My qualifications for this assessment are the following: I am an assistant professor in the USC School of Architecture in the Landscape Architecture Program where I run the Landscape Morphologies Lab, a lab that often focuses on the LA River and other (landscape) infrastructures and collaborates with the Army Corps of Engineers, Bureau of Engineering, and Department of Water and Power; I am an author of the original Los Angeles River Revitalization Master Plan and creator of many of its maps, including the habitat analysis, as part of the Mia Lehrer & Associates team; I am the co-author of an internationally published (English, French, German, and Chinese editions) and recognized book on complex landscape systems, including river restorations (Living Systems: Innovative Materials and Technologies in Landscape Architecture, Birkhauser 2007) and contributor to the book Landscape Infrastructures: Case Studies by SWA Group, Birkhauser, 2011; and finally I was Landscape Architecture Foundation Fellow, a funded researcher of metrics for landscape architecture.

According to the Los Angeles River Revitalization Master Plan, the publicly-vetted plan that preceded and set the stage for the ARBOR study, the first goal of the master plan was to "Revitalize the River... As a very long-term goal, its ecological and hydrological functioning can be restored through creation of a **continuous riparian habitat corridor within the channel**, and **through removal of concrete walls where feasible.**" This goal, as related to the river channel is understandably difficult, but remains the most important goal and has been well vetted and is the major impetus for seeking the ARBOR study.

My analysis of Alternative 13 and Alternative 20 suggests that there is a significant difference in these two alternatives in terms of the restoration of the river channel itself and thus it's ability to function as an effective ecosystem, ecological corridor, public recreation zone, and

1



acceptable outcome for the city residents. For example, in terms of linear in-channel restoration Alternative 20 restores twice as long a stretch (excluding invasive management) of the concrete channel, or a little more than half to the ARBOR area.

My primary comment is, that of the many reasons Alternative 20 should be selected over Alternative 13, I believe there are inconsistencies in the study and missing considerations that have resulted in an undervaluing of improvements to the linear river corridor / channel. My specific comments are listed below:

1. **The first planning objective of the ARBOR study is to restore Valley Foothill Riparian Strand habitat. However, the CHAP analysis appears to under-value restoration that occurs within the primary Riparian zone – the riverine channel itself and directly adjacent banks. This is particularly problematic given the emphasis on the CHAP analysis within the report in the selection of alternatives and the subsequent explanation to the public and entities.** While “strand” is never defined in the report, presumably this refers to the historic pattern of Riparian vegetation to congregate around long, linear, and sometimes narrow river and stream corridors.
  - a. According to figure ES-4, and contrary to the statement that CHAP is not acreage based, the analysis appears to be more or less correlated with area. This would bias Alternatives, such as 13, with fewer channel modifications and more adjacent large-parcel restorations.
  - b. While clearly stated in the report, CHAP analysis is known not to value connectivity, such as hydraulic, linear, and regional. This results in parcels that are within the actual river or directly adjacent having equal or greater value than parcels that are not as well connected. While other tools were used to measure connectivity, CHAP analysis remained *the* pivotal decision making / alternative selection tool. For example, in table ES-1: Comparison of Final Array of Alternatives, connectivity is not referenced.
2. **“Increase Habitat Connectivity” is the second objective of the study and its importance is explained extensively in multiple sections within the report. Improving connectivity is clearly a critical part of this study as it supports the Army Corps purpose “... to restore significant structure, function and dynamic processes that have been degraded.” However, the report appears to be inconsistent in its relative valuing of connectivity.**



- a. The ARBOR study was limited to the 11-mile Glendale narrows reach because of the evaluations of the importance of this section in terms of ecosystem connectivity and restoration:

From the ARBOR Study:

*"...the iterative study process resulted in a narrowing of the Study's geographic focus from the entire 32 miles to the 11 mile soft-bottomed Glendale Narrows stretch because that area shows the most promise for ecosystem restoration (Figure ES-3).*

*"The upper and lower reaches of the river have less potential to connect nationally and regionally significant ecological zones because of the state of existing development. "*

*"The technical significance of restoration in the ARBOR reach is also based on the importance of nodal habitat connectivity (i.e., large and small aquatic habitat patches connected via habitat corridors).*

*"The proposed LA River ecosystem restoration project would provide **an essential backbone** of physically connected habitats along a primary wildlife movement corridor/migratory pathway."*

These statements would suggest that the recommended alternative would address connectivity and restoration in a comprehensive fashion within the ARBOR section, given that it is the greatest opportunity within the 51 miles river and must function as a "backbone". This further emphasizes the importance the value of making a connection to the Verdugo Mountains, as does Alternative 20. However, this justification or consideration is not present in other parts of the study and the recommended alternative is justified without addressing this larger context. If the study was consistent with its original statement I would expect this would be part of the final consideration for the final recommendation.

- b. Frequent mentions are made to the fact that Alternative 13 provides a incremental improvement of 309% in Nodal Connectivity over Alternative 10 and is used as a justification for adopting this recommended plan. However, I find this statement to be arbitrary, given that Alternative 10 providing no significant Nodal Connectivity improvement

over the existing / baseline conditions. Deduced from the percentages stated, Alternative 20 provides an over 1200% improvement over existing conditions, or 407% improvement over Alternative 13. Given that connectivity has been stated as a critical part of this study, it seems that the radical improvement that 20 provides should be better represented and considered, especially since CHAPs does not represent connectivity and gives the impression that it is a linear progression of improvements between the alternatives, rather than nearly an order magnitude in important aspects.

3

3. **Visual Quality and public Acceptability of the River Channel has and will likely have large implications in the extent that the large adjacent human populations function as stewards vs. disturbance and affect the extent that this project is perceived and ultimately supported. This study recognizes that the existing conditions of the trapezoidal concrete channel invites a number of unattractive uses and degradation, but does not consider how future alternatives may be more suitable to prevent this. Given that the impetus of this study is largely based on the unfavorable perception of the river, its current un-"Acceptability" it seems appropriate that the study evaluate alternatives within this light.**

By my initial analysis the trapezoidal concrete visual character of the entire 11 miles reach of the ARBOR study is currently universally considered un-"Acceptable" and induces poor stewardship, marginal recreation, and unattractive uses. Alternative 13 reduces the extent of this condition by 3.2 miles, leaving 7.8 miles in more or less the same un-"Acceptable" state. Alternative 20 on the other than hand, reduces this condition by 6.4 miles, leaving more 4.6 miles, less than 50% of the area in an un-"Acceptable" state. The extent that the unattractive river channel itself is improved has disproportionate significance in terms of restoration as it represents the river itself. It should be considered that Alternative 20 is the only alternative that improves most of the existing river channel within the ARBOR reach. This improvement will have measurable impacts in terms of stewardship, public recreation, and overall sentiment that will in turn have substantial impacts of the habitat quality itself and Acceptability of this public investment.

4

This topic, of how to design a river restoration, that best interfaces with the dense surrounding human population in terms of visual quality and recreation, in ways that are safe, appropriate, and cost effective, is a topic of particular interest to my research and for the USC Landscape

Architecture department. We would be very interested to participate in further research with the Army Corps as the project proceeds.

Please also review the attached maps.

Thank you for this landmark study and I hope you find these comments helpful in finding the best possible outcome for this project.

5

Best,

A handwritten signature in blue ink, appearing to read 'Alex Robinson', with a long horizontal flourish extending to the right.

Alexander Robinson  
Director, Landscape Morphologies Lab  
Assistant Professor, USC Landscape Architecture Program



# ALTERNATIVE 20 creates an Ecological “BACKBONE” for the Entire River

USC Architecture

## NODAL HABITAT CONNECTIVITY TO THE VERDUGO MOUNTAINS (Significant Ecological Zone) AND MOUNTAINS BEYOND (NOT IN 13)

### BACKGROUND

Given that the ARBOR study focused on this limited 11-mile area of the 51 mile river because it shows “greatest promise for ecological restoration” and that the “LA River ecosystem restoration project would provide an essential backbone of physically connected habitats along a primary wildlife movement corridor / migratory pathway.” (quotes from ARBOR Study), it would be consistent with the report to choose a plan that provides essential regional connectivity and creates a very connected and viable “backbone”.

Alternative 20 provides an essential set of improvements over Alternative 13 in terms of creating a connected ecosystem that can serve as “backbone”.

### BASED ON ARBOR ANALYSIS:

**Alternative 20 has >1200% increase in Nodal Connectivity over Alternative 10.**

**Alternative 13 has a 309% increase over Alternative 10 (which is the same as baseline).**

**Alternative 20 has a 407% increase in Nodal Connectivity over Alternative 13.**

This map shows the hydraulic connectivity of habitat improvements and also the nodal connectivity via hydraulically connected corridors. Hydraulic connectivity and exchange is an essential part of any riverine ecosystem and is well argued in the ARBOR study.

### LEGEND

- Habitat Directly Connected to River Hydrology or Directly Adjacent to such Habitat
- Habitat Connected to River Hydrology though Culvert
- Riparian Habitat not Directly Connected with River Hydrology (top of wall / concrete bank)
- River Channel with Soft Bottom Vegetation
- Concrete River Channel
- Major Habitat Corridors (line drawn adjacent to river)
- Major Habitat Nodes

Alternative 20 creates a “backbone” condition that is connected to the river itself, allowing strong connections all the way from Mission Yard to Griffith Park and the Verdugo Confluence, habitat connectivity node.

## NODAL HABITAT CONNECTIVITY TO THE ARROYO SECO AND WATERSHED

Alternative 20 connects to Mission Yards and has a much more open hydraulic connection to this large habitat node.



# ALTERNATIVE 13 Fails to create a Viable Ecological "BACKBONE" for the River

USC Architecture

Alternative 13 does not improve nodal connectivity to the Verdugo Mountains, one of the key opportunities for improving habitat connectivity.

Alternative 13 does not create a very viable backbone and also doesn't even connect substantially to major projects even within its alternative, such as the Mission Yard.

Most connectivity appears focused in area and does not create a "backbone".

NODAL HABITAT CONNECTIVITY TO THE ARROYO SECO AND WATERSHED

## BACKGROUND

Given that the ARBOR study focused on this limited 11-mile area of the 51 mile river because it shows "greatest promise for ecological restoration" and that the "LA River ecosystem restoration project would provide an essential backbone of physically connected habitats along a primary wildlife movement corridor / migratory pathway." (quotes from ARBOR Study), it would be consistent with the report to choose a plan that provides essential regional connectivity and creates a very connected and viable "backbone".

Alternative 13 does not create a viable backbone and major parts of the project are not well connected to others.

## BASED ON ARBOR ANALYSIS:

**Alternative 20 has >1200% increase in Nodal Connectivity over Alternative 10.**  
**Alternative 13 has a 309% increase over Alternative 10 (which is the same as baseline).**

This map shows the hydraulic of habitat improvements and also the nodal connectivity via hydraulically connected corridors. Hydraulic connectivity and exchange is an essential part of any riverine ecosystem and is well argued in the ARBOR study.

## LEGEND

- Habitat Directly Connected to River Hydrology or Directly Adjacent to such Habitat
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- River Channel with Soft Bottom Vegetation
- Concrete River Channel
- Major Habitat Corridors (line drawn adjacent to river)
- Major Habitat Nodes

Mission Yard is hydrologically connected by culverts, but otherwise not part of the Riparian Corridor.



# It's all about the River . . .

The existing condition of the Los Angeles River\* is universally considered to be “unacceptable” (or worse) by most criteria. It also is the impetus for the ARBOR study – we need the USACE in order to improve this wounded part of our watershed.

**Alternative 20 restores\*\* more than TWICE as long a run of the river channel as Alternative 13.**

**By this criteria Alternative 20 is twice as “acceptable”† as Alternative 13.**

Furthermore, USACE is the only entity with the means to restore the channel and this is a primary goal and expectation of the project.

Luckily, Alternative 20 is a “best buy” and should be selected by the Corps as the only acceptable option.

**Within a 1/2 mile of Alternative 20 river channel restorations vs. Alternative 13...**

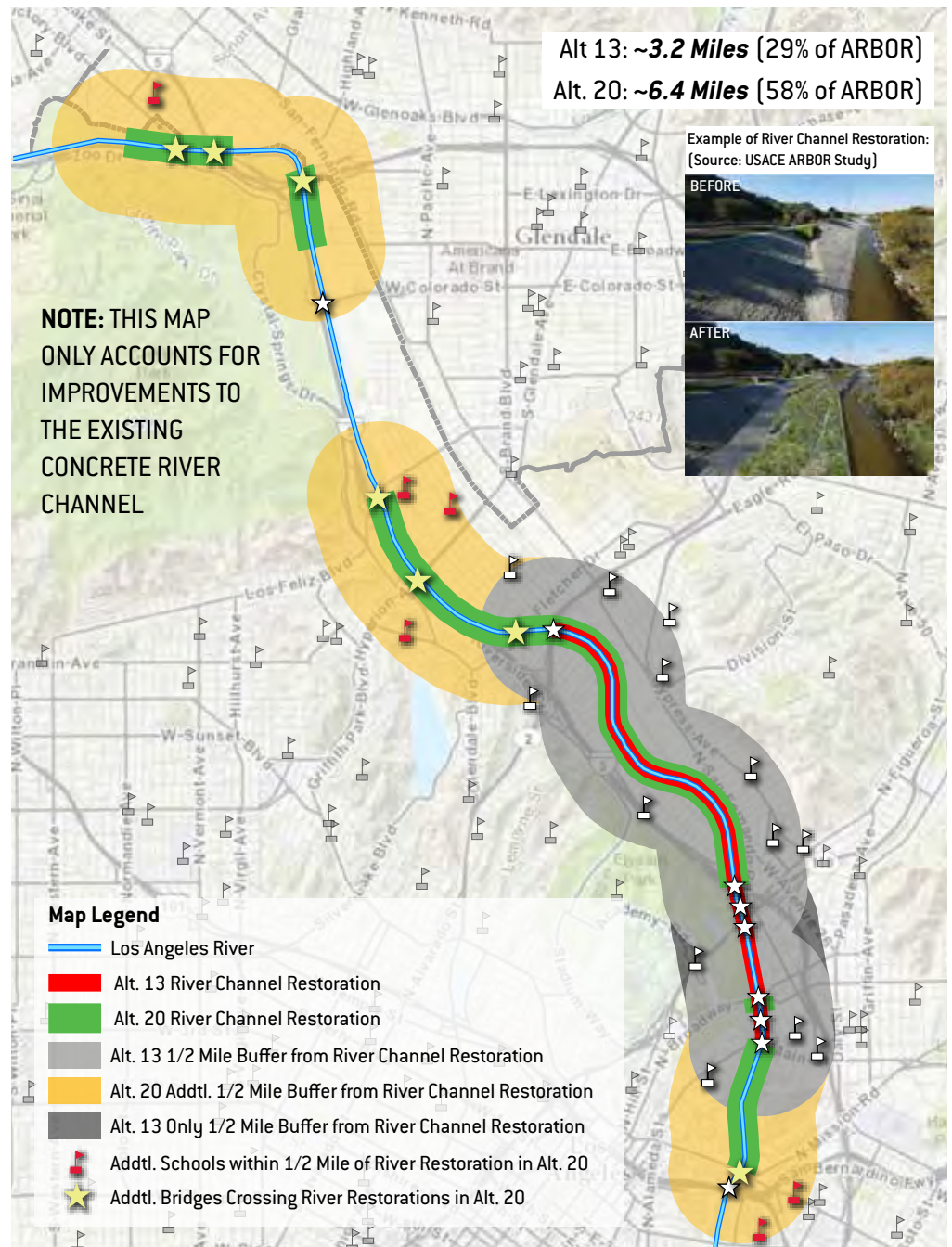
...there are twice as many people who will have easy access to an “acceptable” river channel with improved habitat.

...there are ~50% more schools that will have easy access to an improved river channel, inspiring children to become river ecosystem stewards (19 vs. 13).

...there are over twice as many bridges carrying people over restored sections of the river channel (13 vs. 6), communicating the value of this restoration and use of the river.

(USACE is the United States Army Corps of Engineers)

Map and measurements are re-drawn from the Draft Integrated Report from September 2013 and are therefore approximate.



\*The Los Angeles River is identified as the area designated to function as a flood management channel (not including the top of bank). While it's valuable that all these alternatives look beyond the river itself, alternative 20 exemplifies itself by its expanded focus on restoring the river channel.

\*\*Restoration refers to habitat or aesthetic modifications of the concrete flood management channel (the River) and does not include invasive removal or top-of-bank planting.

†Acceptability is a USACE criteria for “workability” or “acceptability” with state and local entities and the public.



Josephine R. Axt, Ph.D.; Chief, Planning Division;  
 U.S. Army Corps of Engineers; Los Angeles District;  
 P.O. Box 532711;  
 ATTN: Ms. Erin Jones, CESPL-PD-RN;  
 Los Angeles, California 90053-2325

**SUBJECT: Los Angeles River Revitalization Plan – Public Comments**

Dr. Axt and Ms. Jones,

The Valley Industry and Commerce Association (VICA) would like to thank you for all of the work you have done and continue to do for the Los Angeles River. We have carefully reviewed the Revitalization Plan and all corresponding alternatives. After much deliberation VICA has decided to support Alternative 20, as we feel that it will have the deepest impact on our region.

Alternative 20 will create jobs through construction, increase natural habitat, provide open space for recreation and boost the region's economy. If executed properly, this plan has the potential to transform the Los Angeles River into a world-class tourist destination and improve the quality of life for all Angelenos.

The other alternatives proposed in the report use a more piece-meal approach to address the river. These plans will not improve all aspects of the 11-mile stretch of river and will end up costing more for continuous improvements in years to come. Alternative 20 provides a complete and holistic approach to revitalization and while the upfront costs seem prohibitive, we are pleased that federal funding has been allocated to help ease the financial burden of this consummate project.

To ensure that this proposal is carried out in the most impactful manner, VICA has outlined foreseeable concerns regarding the plan and possible areas of improvement. We feel that if these concerns are addressed before construction begins, the project will be carried out efficiently and effectively.

1. **Protect Industrial Zones** – Certain parcels that will be acquired under Alternative 20 are zoned for heavy industry and manufacturing. While we understand the need to transform these zones into open space for the vision of the plan, we must ensure that those acres are replaced elsewhere in the city. It is currently very difficult to rezone zones in the city to industrial zones, and with the shrinking of these zones due to river projects we must be fair to the manufacturing industry and ensure that this vital part of our economy has adequate space to produce.
2. **Focus on Stormwater Capture** – This aspect of the plan, while second in priority to revitalizing natural habitat, must remain a central focus during development and planning. By developing storm water capture and storage systems into the development of the river, the city will send a

message to the rest of California that we are committed to utilizing local water sources before turning to imported water.

3. **Maintain the Core of the Proposal** – VICA supports this plan based on the information originally presented, and in order to ensure successful completion of this project, the city must hold to its original financial proposal. The actual cost should not exceed original estimations. Additionally, development on a project should not begin until complete funding for that project has been identified and allocated. The city's share of funding for this project should come from holdings meant to be spent on habitat, open spaces, parks, storm water capture and infrastructure. This project should in no way equate to depleted funds for other city necessities. Finally, if funding is not available at the start of a project, the city must not pass this cost along to another city department or to Angelenos.

4

Should these concerns be addressed and considered throughout the entire development of the river, we believe this plan will be successful and beneficial for residents, businesses and visitors. Alternative 20 envisions the most robust restoration of the L.A. River and we look forward to working with you toward this vision.

Sincerely,



David Adelman  
Chair



Stuart Waldman  
President

Dear Glendale City Council,

On behalf of Walk Bike Glendale, I am writing to give our utmost support for Alternative 20 of the Los Angeles River Ecosystem Restoration Integrated Feasibility Report. Alternative 20 is the only one which will transform 11-miles of the Los Angeles River into a much more complete ecosystem, providing Glendale residents with significantly greater access to much needed open space and walking/biking trails.

As a local organization that supports greater access to safe walking and biking access for Glendale residents, Walk Bike Glendale believes that it is within Glendale's very own interest to support Alternative 20 wholeheartedly. We can only gain from what Alternative 20 proposes to do. Our City will be better off and the quality of life for many Glendale residents will likely improve substantially from the greater connection to nature that will result.

Our City should not lose sight just how much more Alternative 20 will provide Glendale residents than the other alternatives. Our City fronts most of the 11-mile stretch that Alternative 20 aims to transform, which is within walking distance to many South Glendale residents. Most of those Glendale residents today have insufficient access within close proximity to adequate open space and safe trails to walk and bike on. Alternative 20 would change that by adding a substantial amount of access for these residents to many outdoor amenities.

Additionally, Alternative 20 aims to transform the connection to the Verdugo Wash substantially by making it a natural habitat with trails for people to walk and bike on. This would be in close alignment with Glendale's own goals, as outlined in the Bicycle Transportation Plan passed in 2012, to make the Verdugo Wash into a continuous path for pedestrians and bicyclists to enjoy.

Please give your unanimous support for Alternative 20 and send a strong message to the Army Corp of Engineers, Congress, and the President that our City has much to gain from having Alternative 20 selected.

Best regards,



Rye Baerg, Co-Chair  
Walk Bike Glendale





**WILD HERITAGE PLANNERS**  
**P.O. Box 50260**  
**Los Angeles, CA 90050**  
**Email: [Jack.Eidt@wilderutopia.com](mailto:Jack.Eidt@wilderutopia.com)**  
**Phone: 323 362 6737**

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, California 90053-2325  
SENT VIA EMAIL

**Re: Comments on Los Angeles River Ecosystem Restoration Integrated Feasibility Report**

ATTN: Ms. Erin Jones, CESPL-PD-RN

Wild Heritage Planners (WHP) is an organization dedicated to sustainable urban planning and environmental design, based in Los Angeles, California. As Director, I have worked on environmental planning in the LA Region for the last twenty-five years and gained my Master's Degree from UCLA in Urban and Regional Development. I have also lived around the river for the last twenty since I moved to Echo Park and now reside in Highland Park.

WHP has been following the ongoing upgrades to the LA River for many years and fully supports efforts to restore habitat, reinvigorate the hydrologic cycle of the river, and introduce recreational open spaces into the area of the river. This process requires ambition and dedication of stakeholders and agencies, as well as significant investment. We laud the Los Angeles area community for supporting an ambitious re-discovery of our long disabused watershed, and thank the Army Corps for moving the process forward.

**The Problem...**

We have made mistakes in the planning of our cities, failing to protect wildlife habitats and ecological systems in favor of subdivisions and shopping centers, freeways and power lines. Turning the 51-mile serpentine-flowing wild river, once-teeming with water fowl, fish, and coyotes into a flood control channel seemed the responsible thing to do to protect property and public safety. Yet, we know the world's great cities provide spaces and places for people to live, play, and work, integrated with wild natural forces and the needs of the ecosystem. We must



clean our surface waters and protect our dwindling water supplies. Urban sustainability in this era of climate disruption and energy and transportation re-imagination requires reclamation of the natural systems that provide us life, solace, sustenance, and connection. Call it ecological urbanism. Call it LA River Revitalization NOW!

We recognize the Integrated Feasibility Report and associated EIR has done an excellent job in letting us know what is at stake. The long process that brought us to this point reminds us it is imperative to seize the moment. The time is now to take responsibility for the problems of the past. If we settle for half measures now, no one knows how long we must wait to pick up where we leave off. Thus, WHP does not prefer the chosen Alternative 13.

We have concerns that the preferred alternative is not compatible with national initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people. We recommend the Corps of Engineers consider the will of the people of Los Angeles who have called for more, as well as the needs of this long-maligned biodiversity hotspot.

## **Choose Alternative 20...**

If Houston can move forward on its \$1 billion reclamation of their Buffalo Bayou system, Los Angeles can certainly do the same. We favor Alternative 20 because it best understands the process Los Angeles must undergo to reconnect its people and wildlife to the river, as well as rethink the natural systems at play. Alternative 20 employs a more comprehensive vision by restoring the Verdugo Wash and the wetlands at the LA State Historic Park, in addition to significant restoration at Piggyback Yard and the confluence of the Arroyo Seco.

Alternative 20 provides superior connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13). Thus, the Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains.

Revitalization of the Piggyback Yard would include real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections.

Restoration of the Cornfields areas also would include meaningful restoration with higher value habitats by terracing the bank and creating a freshwater marsh. In addition, the Cornfields can provide wildlife and human recreational connection to the Elysian Park, which is mostly an island cut off from the city except for some Echo Park neighborhoods.

By choosing Alternative 20, we would reduce the distances between the revitalized habitat nodes which would enhance their intrinsic value and closer replicated the ecosystem that historically existed prior to the channelization.

The length of area restored would be two times greater (6.4 miles vs. 3.2), with more than three times the concrete removed (117,918 cubic yards vs. 36,891). Alternative 20 would create 131 more acres of restored habitat (719 vs. 588). As well, the habitat restored would render a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes.

Alternative 20 would more likely be sustainable and resilient over the life of the project because of the size and added connectivity. It measures the highest of all alternatives against the 19 performance targets established under the two objectives of the study. Furthermore, it best meets the four evaluation criteria (effectiveness, completeness, efficiency, acceptability).

The Regional Economic Development analysis shows Alternative 20 provides 7,015 more jobs and \$386 million more in wages during construction. It creates 3,700 more new jobs and \$251 million more in wages for redevelopment over the long term. It creates 1,094 more new permanent jobs valued at \$62 million more.

The Other Social Effects analysis shows Alternative 20 with its larger scope will produce a greater connectivity with the people and communities. It will reach more of the census tracts with high poverty and high minority populations. It will provide more green areas to encourage physical activity. It will provide more green areas to reduce air quality effects.

At Wild Heritage Planners, we advocate for green-built-cities interconnected by public transit, bicycle, and pedestrian paths. We also have worked to advise government and industry in Southern California how to protect open spaces and wilderness habitats, while serving the urban needs of the populace and making room for economic growth and community prosperity. Choosing the more ambitious option will only further encourage gentrification of the neighborhoods along the river, improving the environment and the local economy. We must also take steps to protect the integrity and affordability of existing neighborhoods, as considerable mixed-income housing opportunities exist in the area and must not be lost.

By increasing public access to the river, these local communities with nowhere to walk from their overcrowded apartments could suddenly set out on an odyssey on their bicycles, race each other across the river bridges, and relax and read a book as the river flows by. Maybe they could walk to work at a new river-oriented-development as well.

## **We Need a More Comprehensive Watershed Revitalization**

Let's just say even Alternative 20 does not nearly approach the massive endeavor we face in reorienting the people of Los Angeles with the maligned Southern California hydrologic cycle, water flowing down from the mountains, replenishing underground aquifers and greening the riparian valleys through the lowlands all the way to Long Beach and the Pacific Ocean. Small restoration projects threaten to be washed away by a potential deluge or dried to a bone by drought that will happen as part of the ongoing process of greenhouse-gas-induced climate disruptions. We are a founding member of the SoCal Climate Action Coalition 350 Group, and we would like to see more action in this study and in the community to protect the city from

climate change, while cleaning up the runoff flowing down the watershed into the ocean, which is basically a sewer for all our sins. We can and will do better.

We do believe Alternative 13 is an excellent beginning, but we have to get more ambitious, or we might be waiting a generation more to breathe life into our river.

### **More Work to Do...**

Today, earth scientists, urban planners and designers, hydrologists, neighborhood activists, and even real estate developers and civil engineers agree on the importance of reclaiming and restoring our river as a habitat, an ecosystem, a watershed, and a world class place to live, work, and play. Public agencies may not always have the luxury to think big, so here the activists in the community are speaking it loud. The time is now. ***Alternative 20 for a greener, more sustainable LA!***



Jack Eidt  
Director  
*Wild Heritage Planners*  
Editor and Publisher  
*WilderUtopia.com*



Petitioning Josephine R. Axt, Ph.D., Chief, Planning Division

## Select Alternative 20

Petition by  
LA River Corp

Los Angeles, right now we have a unique opportunity to have our voices heard and make real change.

Last week, the U.S. Army Corps of Engineers selected Alternative 13, the second cheapest of four options detailed in the much-anticipated Los Angeles River Ecosystem Restoration Study. Alternative 13 is good, but we can do better. Alternative 20 presents a much more comprehensive and dynamic approach to LA River Revitalization.

Alternative 20 is the only option that will create a publicly accessible, cherished, and celebrated natural resource in our world-class city. It is the most expansive LA River ecosystem restoration plan, one that includes 6 key sites: Arroyo Seco Confluence, Cornfield-LA State Historic Park, Piggyback Yard, Taylor Yard/Bowtie, Taylor Yard/G-2 and the Verdugo Wash Confluence

River aficionados and Los Angeles officials are unanimous in their support for the most expansive and ambitious restoration program, a plan that will include all of these major sites under consideration.

In early August, our State legislature came out in support of the study. Congressman Becerra said, "We've reached a fork in the history of the Los Angeles River. I support the study's Alternative 20 restoration plan that is an inclusive ecosystem restoration, increases green space and truly connects people and the river. Let's grasp this opportunity to reimagine a once blighted and neglected waterway into a foundation for more sustainable and livable communities." In late August, the Los Angeles City Council unanimously passed a resolutions introduced by Councilmembers Mitch O'Farrell and Gilbert

Cedillo endorsing the most expansive alternative. And last week, the Los Angeles Times Editorial Board agrees that Alt 13 is adequate and wrote their support for an alternative that includes terraced walkways.

**Let's match their support.**

***Sign this petition now to call for an alternative that would inspire our imaginations, build positive community investment and grow our regional economy.***

If we restore the Los Angeles River to the full potential of Alternative 20, we will be miles closer to a destination worthy of Los Angeles that everyone can access and enjoy.

Now is the time to show grassroots support for the best plan. The LA River, which was once entirely buried in concrete, can live again.

***Sign this petition to tell the US Army Corps of Engineers that Angelenos support Alternative 20.***

To:

Josephine R. Axt, Ph.D., Chief, Planning Division, U.S. Army Corps of Engineers  
Select Alternative 20

Sincerely, [Your name]

Total Signatures: 205

## Supporters

### Reasons for signing

---

Kevin Kipnis NORTH HOLLYWOOD, CA

Unity of people and wildlife for our land.

Lila Roberts LOS ANGELES, CA

Living in elysian Valley my whole life. The river is like your backyard. You go out to enjoy it, watch the ducks and fish. My children fish the L.A. and I would like my future grandkids to be able to fish there as well.

Diana Lejins LONG BEACH, CA

This is a no-brainer. We have this wonderful resource and it should be available to citizens.

Carol Peterson LOS ANGELES, CA

...for the good of the environment and of the city of Angeles, which I love

Betsy Mines LOS ANGELES, CA

Bringing the river back from a concrete ditch to its natural habitat is an environmentally positive step.

Paul McDermott LOS ANGELES, CA

Alternative 20 will bring life to the community.

Signatures are on file at  
USACE, LA District.  
Available upon request.



Kate Hoffman LOS ANGELES, CA

I live here. The river has been lost to us for so long - it's time to bring it back!

Jason Rice LOS ANGELES, CA

The LA river currently is an eyesore and a terribly execute plan from an era when concerns were primarily about mitigation. Unfortunately, the natural mitigation measures that were already in place were ignored and resulted in a sterile, unhospitable place. Alternative 20 does the most to correct the mistakes we have made, this is why it should be selected.

Dennis Martinez LOS ANGELES, CA

The vibrant future of the LA River is tied to the direction that the City of LA needs to be headed.

Cynthia Hirschhorn PACIFIC PALISADES, CA

The LA River is a reality and metaphor which connects our city. It can be a beautiful bridge to all the cultures and communities along the river and give people an opportunity to experience both nature and culture at the human pace of walking and bicycling together rather than enclosed in a car on a freeway. As a world class city we should also invest in a world class riverfront like most every other major city in the world! Our time is now!

Glenn Wolf LOS ANGELES, CA

Rivers are important part of drainage, wildlife and recreation opportunities. Going for a basic design doesn't really improve anything. Going for a more extensive fulfilling project is really beneficial over time. It is something we can be proud of, improves neighborhoods and land values near the project. New York has Central Park which was a dump and shanty town, it has served very well and pride of the city.

Pablo Garcia LOS ANGELES, CA

Because I live one block from the LA river

Athenas Lopez LOS ANGELES, CA

Revitalize the viaducts along the 51 mile Los Angeles River, they deserve more appreciation. Thanks

miuchael pigneguy LOS ANGELES, CA

one of the few peaceful, carless walkways for me and my dogs.... less cars...more people spaces please. Oh, and while you're at it can we have a proper public transportation system, you know, like HongKong's ??

Heng Zhang CAMBRIDGE, MA

LA river is a great masterpiece of concrete channel, yet with greater urge for human accessibility, natural restoration and other needs, we should try our best to give the river back to LA people, flora and fauna alike.

Bao Quoc Doan LOS ANGELES, CA

Because i live here...

Jennifer Zell LONG BEACH, CA

Cleaner water downriver and a local example of how best to integrate ecological and recreation systems with engineered systems. Alt 20 is the most effective proposed alternative.

Bonnie Fisher LOS ANGELES, CA

Los Angeles is a city worthy of a decent greenbelt. Let's do it right.

Kris Sanders PASADENA, CA

For the health and welfare of all Angelenos, it's critical to have open space that is preserved and respected.

Marian Dodge LOS ANGELES, CA

We need to wildlife connectivity this alternative provides.

Lawrence Sanchez LOS ANGELES, CA

The Los Angeles River and its rich plant and animal habitat provided a livelihood for the Gabrielino Indians (Tongva), one of the largest group of Indians in North America who established a settlement on the banks of the River near where Los Angeles City Hall stands today, nearly 1000 years ago.

The Los Angeles River changed course between flowing west into the Santa Monica Bay along the course of Ballona Creek and flowing south towards San Pedro Bay between 1815 and 1825.

Channelization of the LA river began in 1938, and by 1960, the project was completed to form a fifty-one mile engineered waterway. Channelization provided flood control for the increasingly developed region and a consistent path for the River course, but changed the utilization of the River as a source of water, and system of streams, wetlands, and swamps of the natural lands and ecosystems, into single use infrastructure. By the time the channelization was complete, the natural and historic Los Angeles River, which for centuries had sustained the inhabitants on its shores, had essentially disappeared. The new metropolis could now rest safely. In later years, the river banks provided the simplest, most accessible right of way for freeways, railways, and power facilities, essentially turning the City's back on its Mother Ditch.

A hint of the original L.A. River survives along three large, soft-bottomed sections – about 10% of the total channel. There, water splashes over boulders, and ponds and rush-lined eddies are home to fish and frogs. Among the groves of willows, scores of species of birds hunt and drink and rest. It's all visible from a series of parks, from bike and walking paths and equestrian trails, and from visitor's overlooks serving as a living reminder of the waterway's original charm.

The LA river once fed the people and wildlife of Los Angeles. LA is seeing changes for the better, in public transit, bicycling culture, art and music and public events. After two centuries of changes, and designing our backs to the River, the City's most basic resource, we now have an opportunity to reclaim and improve what gave life to the Tongva tribes who first settled here. We have done so much to make the river safe for the millions that live here, now let us equal that effort by make it accessible and enjoyable too.

Jennifer Olsen WOODLAND HILLS, CA

We've spent the last century destroying our natural surroundings. For the future of Los Angeles, we need to restore the river and all of it's life-giving capacity.

Bergen Moore LOS ANGELES, CA

The river has so much potential, it could transform the East Side into a glorious thing, and reconnect LA with its river

Bergen Moore LOS ANGELES, CA

I love the LA river, and already enjoy it's bike lanes, flora and fauna. I think it can transform East LA to restore it well.

Cynthia Hubach LOS ANGELES, CA

The river can and should be the center of a newly imagined Los Angeles, one that prioritizes recreation and green space, environmental stewardship and sustainability. Alternative 20 is the plan that best achieves these goals.

Tracy Stone LOS ANGELES, CA

The river is the most important greenspace in our community, and the health and beauty of the river has a direct impact on the health and well-being of our residents. I support Alternative 20's inclusive restoration plan wholeheartedly.

George Villanueva LOS ANGELES, CA

It will help the northeast neighborhoods and Los Angeles thrive socially, environmentally, economically, recreationally, and culturally!

Susanna Schick LOS ANGELES, CA

I bike the LA river every weekend. It's my sanctuary in LA. This city desperately needs a healthy wetlands. The birds need it. Our air needs it. Our EYES need it.

Mary Beth Sorensen LOS ANGELES, CA

The river should be a resource available to the community of Los Angeles and all citizens and tourists alike, not just given the least expensive update. Alternative 20 provides for that.

John Palmerton LOS ANGELES, CA

This is a rare opportunity to impact our city for many generations to come. We're spending much more than a billion dollars on airport renovations; let's give Angelinos and tourists more reason to love L.A.!

John Kim CHICAGO, IL

I love the bike path and would love it to be even better!

Charles Savinar NORTH HOLLYWOOD, CA

Where there is a living river, there is living life!! We need the river, and now, the river needs us. Its just another symbol of the need for maintaining local, sustainable resources to benefit us all.

Scott Epstein LOS ANGELES, CA

The Los Angeles River has the potential to be our great city's signature public space. We're already seeing a miraculous transformation, with new parks and pedestrian and bicycle paths along the river, and the opening of the river for boating this summer for the first time in decades. Alternative 20 of the Army Corps study would accelerate this transformation by adding new habitat along the river, improving the quality of water in the river, and giving Angelenos and visitors to our city access to incredible recreational opportunities. At the same time, we will create jobs, jump start economic development in riverside communities, and promote healthy lifestyles. Please support the most expansive transformation of the river by signing this petition and writing to the Army Corps.

Brian Burke SANTA MONICA, CA

Most Americans mock our LA for its unnatural, unhealthy, disgusting cement channel, once called a river.

What a wonderful opportunity to create a real living riparian natural environment.

Vyki Englert LOS ANGELES, CA

I want a safe space to ride my bike, and clean air in my neighborhood!

Mary Rodriguez LOS ANGELES, CA

This is the future of Los Angeles. A re-birth of the city connecting us to the earth, water and Life.

Deborah Murphy LOS ANGELES, CA

i live very close to the la river and it is a vital part of my open space network. we need more habitat as well as passive and active recreation space in my community and the city as a whole. the river connects many important neighborhoods that lack resources and the river can help to fill that gap.

Doris Brown EVANSTON, IL

LA should have the same river access and enjoyment that San Antonio has and which Chicago is working toward!

Steve Garcia GLENDALE, CA

I live 1/4 mile of the L.A. River

Lisa Cole LOS ANGELES, CA

We live right near the now ugly LA River and really want to see it live up to its potential. Its so embarrassing that LA has so much access to nature yet is so lacking in natural rivers and more parks, etc. Please Pick Alternative 20!!!

Elizabeth Dymond STUDIO CITY, CA

Los Angeles has been working since the late 90's to bring back the LA River. The Corps is selling Los Angeles short with a less than adequate proposal. Now is the time to make the river accessible to everyone and have the waters of the LA River serve this magnificent city.

Renee Curtis L.A., CA

This is the only option that will most benefit the City and make L.A. a world class destination.

Lauren Logan LOS ANGELES, CA

The LA River is an unknown and underutilized connector in this city and represents an opportunity for Los Angeles to reach its potential as a connected, green, urban community. It is and should be the heartbeat of this city; let's value it as such.

Boris Mindzak LOS ANGELES, CA

The Los Angeles river has the potential to become one of LA's most valuable natural resources. We should do all we can to transform it into a major landmark. Where else can you find a nature preserve in the middle of a city?

Sean Leonard BURBANK, CA

Any chance we are presented that involves given nature an opportunity to flourish once again should be seized upon.

Darren Embry LA, CA

This is an opportunity not to be missed, not a time for half measures. Do the most we can NOW...who

knows what the future holds.

Gregory Haynes LAKEWOOD, CA

Our City should ALWAYS be doing what it can to improve itself. Bringing the river back to a usable and accessible amenity in the area only encourages good things.

Joanna Sanchez LOS ANGELES, CA

I live in Elysian Valley and personally love the LA River, bike path, kayak tours and everything else that is going on along the river. I look forward to the LA River becoming a place all of LA wants to come and enjoy.

Rohan Gupta LOS ANGELES, CA

Its the closest large body of water to where I live, work and play.

Damian Robledo LOS ANGELES, CA

I live and work along the LA River and use it's banks and paths as a commuter. I'd like more amenities and better recreation for pedestrians equestrians and bicyclists. It is an amazing untapped resource and we have a great opportunity to improve the lives of Angelenos and visitors to LA. Now is the time to be bold and the Alt 20 cost will look like a small cost in about 10 years when the River is plush and healthy. The return on that investment will be 10 fold.

Jessie Thurston LOS ANGELES, CA

The river deserves it, and so do we.

Jackson Piper NEWBURY PARK, CA

This is an opportunity to provide Los Angeles residents and the people of Southern California, as well as visitors from elsewhere, with a great new public space along it's long-neglected river. Alternative 20 is the most ambitious and the most expensive, yet it is also the alternative that would best allow the river to become the new heart and soul of the city. This moment in the history of Los Angeles and of the river that bears its name deserves better than half-measures and minimum alternatives. It deserves the full effort of all involved. Please select Alternative 20 as the plan to implement for the Los Angeles River.

Kevin Mulcahy LOS ANGELES, CA

Restoring our river, revitalizing Los Angeles and our access to both in this single act will become and define our City's future. If we do not do the right thing now, I ask when? We can not, in good conscience, float such a significant component of this repair another generation further down stream as would be the result of selecting anything short of Alternative 20. Failure to act and complete a mission is not a principle tenet of the Army Corp. and should not be the goal now. To be clear, Alternative 20 is provided precisely because it is the complete mission while remaining reasonable, achievable, cost effective and balanced. Please support and select Alternative 20 and give us, all of Los Angeles, the future we deserve and want to pass to our children.

Katherine McNenny LOS ANGELES, CA

Because downtown needs a connection with this restoration project- hopefully, consideration will be made to extend this down to the 6th St. bridge (or further)

River Love LOS ANGELES, CA

Because the LA River can change LA for the better!



# Sign our Petition - Restore the L.A. River

## Official Resolution in Support of the Selection of Alternative 20

WHEREAS, the Los Angeles River is the lifeblood of our community and a vital resource to be restored and protected; and

WHEREAS, in 2006, the Los Angeles City Council approved an agreement with the US Army Corps of Engineers (Corps) for the Los Angeles River Ecosystem Restoration Feasibility Study (Study); and

WHEREAS, in 2013, the Corps has developed a final array of four alternatives for the Study, and only Alternative 20 includes both significant restoration at the Los Angeles River's confluence with the Verdugo Wash near the City's border with the City of Glendale, and the only substantial western bank connection-providing a profound hydrological link between the Los Angeles State Historic Park and the river; and

WHEREAS, these two areas provide critical wildlife habitat connectivity to the Verdugo and Elysian Hills, respectively, and are included in the five key opportunity areas of the City Council-adopted Los Angeles River Revitalization Master Plan, which the US Congress directed the Corps to consider; and

WHEREAS, *Alternative 20* provides the most robust ecosystem restoration outcomes while also providing four times more jobs than the Corps-preferred alternative, and will thereby most appropriately redress historic environmental injustices that resulted from the river's channelization—providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles

***NOW, THEREFORE BE IT RESOLVED, that the undersigned supports the selection and full implementation of Alternative 20 by the United States Army Corps of Engineers to restore our Los Angeles River.***

By signing, you agree to submit your name as an official public comment regarding implementation of the Los Angeles River Ecosystem Restoration Feasibility Study.

Total signatures: 8104

Signatures are on file at  
USACE, LA District.  
Available upon request.



St. Sebastian Catholic Church  
1452 Federal Avenue  
Los Angeles, CA 90025

November 12, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corp of Engineers; Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Josephine Axt,

As community members at St. Sebastian Catholic Church in West Los Angeles, we fully **SUPPORT** Alternative 20 because it is the most expansive and visionary plan for the future of the L.A. River. On behalf of our parish, we have collected **185 signatures** from parishioners who support Alternative 20.

Moreover, Alternative 20 is vital in improving habitat connectivity while ensuring that adjacent river communities have access to green space. It is noted, that communities adjacent to the river are composed of low-income communities, which lack resources to live a healthy lifestyle.

Furthermore, Alternative 20 will be a great benefit to Angelenos and their families. Providing new public access to natural open spaces, improving public health, stimulating regional and local economies, and enhancing the quality of life in Los Angeles.

We look forward to monitoring your public position on this vital issue that directly impacts the City of Los Angeles. If you have any questions, please contact David Cortes at (310) 966-0878 or via email at david.cortes712@gmail.com. Thank you!

Sincerely,  
St. Sebastian Catholic Community

**Enclosed: Additional pages with signatures.**

Signatures are on file at  
USACE, LA District.  
Available upon request.

Dear Dr. Axt:

My name is Herb Agner, a 17 year resident of Los Angeles (originally from Nashville, TN) and 9-year resident of LA's Silver Lake neighborhood, near the Glendale Narrows section of the LA River. I bike the river a few times a week, along the LA Bike Path, and often take my son with me to see the wildlife in and along the River too. I have a Bachelors Degree and have worked as a Vice President of Marketing and Product Development for over a decade for 2 major record companies. I'm a member of FoLAR, and have participated in their annual river cleanups. I come from a part of the country where rivers, streams, and creeks run through cities and towns of all sizes, and have been puzzled and saddened to see the state of the LA River during most of my time here in LA. After getting involved with FoLAR, though, and working to make positive change, I've become excited about the momentum toward making the LA River a better place.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City (this is a major factor, in my opinion)

Alternative 20 is far superior to Alternative 13 for the following reasons:

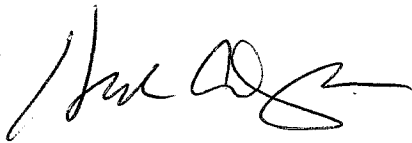
- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and

wildlife connections

- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,



Herb Agner

**From:** [Emiliana Aguilera-Gonzalez](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Judy King](#)  
**Subject:** [EXTERNAL] Re: Los Angeles River EIR  
**Date:** Tuesday, November 19, 2013 6:37:46 PM

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Josephine R. Axt, Ph.D.,  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Erin Jones  
CESPL-PD-RN  
Los Angeles, CA 90053-2325

November 18, 2013

Dear Dr. Axt.,

I would like to start off by saying how excited I am that this project is still moving forward. As a former resident of the Arroyo Seco community, I recall the buzz of “What if” questions stirring around the neighborhood and a few artistic pieces setting the stage of transforming the river’s presence. However, after carefully reviewing the Los Angeles River Draft Ecosystem Restoration Integrated Feasibility Report, written by the Army Corps of Engineers, I noticed a few issues that need more clarification. My main focus is centered on Appendix A of the draft design which entails the safety aspects of wildlife access. I will also key in on the positive approach to Daylight Streams in restoring the riparian and marsh habitat. I will also point out a few concerns that I noticed with the materials that will be used to help during the restoration of our wonderful river.

On page 11 of appendix A under the 3.1.3 Wildlife Access the measure states that it will provide access and crossing for wildlife between the River and adjacent landscapes which will include bridges, under-crossing and tunnels. I would have to say that I am glad that the Army Corps is taking this approach and concern for wildlife. However, is the community along the river open to this concept? With concerns of wildlife such as a bob cats, coyotes or black bears roaming around a suburb community have caused local media attention and chaos. The impact from a few examples of media attention have not been



positive and has caused a concern to both the safety for wildlife and people being able to coexist since the project is approximately from Griffith Park to downtown Los Angeles. I am also concerned with what type of vegetative planting will be used along this river as a food source for wildlife. I understand that in your report that in order to stabilize planting and reduce erosion potential that turf reinforcement mats (TRM) or geotextile fabric is proposed for the design, however, what will happen to burrowing animals that might stake claim along the river. My concern is due to both TRMs and geotextile being thick fiber, ultraviolet resistant materials that can be an ecological problem for burrowing wildlife.

1

As for your approach to Daylighting Streams to help restore both riparian and marsh habitat, it is a great idea. I was thrilled that the existing storm drains would remain in place and be modified to convey peak storm flows. The thought process of restoring the wetlands or ponds is a creative design measure in your report and I am pleased that the source of water will be used for water quality treatment and wildlife use.

According to page 6 both the low-flow diversion and high-flow bypass would allow the existing storm drain's nuisance flow and first pollutants to be diverted from the storm drain line to the wetland area for treatment and infiltration and then return back into the River. I was just wondering how this diversion process would work and will it be an effective idea since Los Angeles only gets roughly 7 inches of rain per year?

2

My last concern with the report is on page 8 with the modification to the channel of removing concrete by excavating and creating an uneven bottom pool and shallow zones that will be stabilized with boulders or weirs to help with the wetland and riparian vegetation. I wonder why this approach was not put into use before the laying of the concrete of the death of the Los Angeles River.

As well as from page 19 to 60 in the compacted fill and maintenance road section of fencing that would be constructed to separate areas of access from the maintenance road, on both the potentially private right-of-way and the river. Is additional fencing needed for this 11 mile stretch since there is already an existing fencing separation? This portion of appendix A was not clear enough and is this separation intended for the safety of the

3

restoration project and wildlife?

In closing I honestly thought this is a great start for the rebirth of the Los Angeles River. Roughly 11 years ago this river was not an ideal walkway to enjoy and I am ecstatic with the concepts that have been proposed and I honestly hope that this project will be able to restore back to how it use to flow. I understand that the Los Angeles River is a meandering river which poses much more challenges in the future, however, the concrete of this channeling needs to go and to help restore Los Angeles water table is a breaking start.

4

Sincerely,

Emiliana Aguilera-Gonzalez

**From:** [Kelvin Alas](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA river restoration project  
**Date:** Monday, November 18, 2013 7:50:51 PM

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I strongly suggest, in regards to the LA river restoration project, that you should take Alternative 20.

**From:** [Peter Alexander](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA RIVER RESTORATION  
**Date:** Thursday, October 03, 2013 11:32:56 PM

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As a native Angeleno living within walking distance of the Los Angeles River, I urge you to please consider Alternative 20 as the final restoration option for this potentially great civic resource.

In this vast urban landscape, a natural oasis is desperately wanted and needed by the residents.

Sincerely,  
Peter Alexander  
2436 Hidalgo Ave.  
Los Angeles, CA 90039

**From:** [EstherLee Bnc Alpern](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River. Alternative Plan. 20  
**Date:** Sunday, November 17, 2013 11:45:34 AM

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There is no doubt in my mind that a more neighborhood friendly plan is required.  
Parks, soccer fields and development of commercial endeavors like eating areas and restaurants,  
something like what was accomplished in San Antonio.  
EstherLee Alpern, area resident

Sent from my iPad



**From:** [Liz Amsden](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for LA River ecosystem restoration - Alternative 20  
**Date:** Friday, October 11, 2013 6:58:28 PM

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My grandmother had a saying, "If a job's worth doing, it's worth doing well."

We need a truly revitalized river in Los Angeles after decades of degradation.

Alternative 20 is more costly but the return is proportionately more and it will benefit more people, create more jobs and provide an ecosystem that has the best chance to stabilize the area.

Please opt for Alternative 20

Sincerely

Liz Amsden  
5158 Almaden Drive  
Los Angeles, CA 90042

**From:** [From CGA](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Restoration - please adopt Alternative 20  
**Date:** Saturday, November 16, 2013 1:36:02 PM

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Dear Friends at USACE:

As a permanent resident of the city of Los Angeles, I support adoption of Alternative 20 to restore and revitalize the Los Angeles River. It is the most comprehensive plan, benefiting the most natural habitat. Mayor Eric Garcetti has demonstrated his commitment to river restoration by campaigning in Washington, D.C., for Alternative 20 funding. Please heed the needs and desires of the citizens of Los Angeles and adopt the plan that provides the most comprehensive restoration of the Los Angeles River.

Sincerely yours,  
Carolyn Gray Anderson  
Los Angeles 90034

Dear Kathleen & Erin,

By way of introduction, I worked at the Los Angeles County Flood Control District (LACFCD)/Los Angeles County Department of Public Works (LACDPW) from 1981 to 2000. In 2000 I returned to Colorado where I now live and work. (I'm in Denver and we did not get the severe flooding that hit the front range last week that you see in the news)

From June 1990 to May 1992, Jon Sweeten at the Corps and I were ex-officio advisors to Mayor Bradley's Los Angeles River Revitalization Task Force effort which was facilitated by Peg Henderson from the National Parks Service Rivers Trails and Conservation Assistance Program. This Task Force was created by Mayor Bradley at the behest of FOLAR and the NPS provided the framework and facilitation needed for everyone to work cooperatively. The result was a guidance document laying out the vision, three pilot projects and recommendations for further action. One of the recommendations was to prepare a Master Plan for the entire River.

In July 1991 I worked with Peg Henderson to prepare the Scope of Work for the County to prepare it's Los Angeles River Master Plan.

This Plan was prepared under the guidance of Diego Cadena & Chris Stone & Manuel Quezada from the County Public Works, Peg Henderson from the NPS, Cynthia D'Agosta & Bertha Ruiz from County Parks, and Sorin Alexanian & Ellen Fitzgerald from County Regional Planning. The plan preparation included cities, agencies and environmental group stakeholders along the entire river corridor

Here is the website: [http://ladpw.org/wmd/Watershed/LA/LA\\_River\\_Plan.cfm](http://ladpw.org/wmd/Watershed/LA/LA_River_Plan.cfm)

It was adopted in 1996.

I see that it is cited in the References page 14-9 of your report (pdf page 492, lines 12 & 13).

In 2005, the City of LA selected Tetra Tech with Bill Wenk, a noted Landscape Architect from Denver as sub-consultant, to prepare a Master Plan for the portion of the River within the City of LA which would also consider urban land use and design guidelines for the River Corridor within the City of LA. Due to jurisdictional limitations, the County Plan could only look at the lands owned by the County & Corps whereas the City's could take into account adjacent uses and zoning issues.

I do not view the two plans as contradictory or mutually exclusive. Both are great guidance documents.

First, I want to say that it makes me proud to see how far the restoration efforts have come and continue to grow since those early days!

## **2 Comments and a Question:**

1. While FOLAR is duly credited, sadly, I did not see recognition to Mayor Bradley and the Task Force which gave birth to the governmental planning and restoration efforts that continue to this day.

I hope that you can find the Task Force Report and note its importance to the history of this effort in the introductory text of the report and "Recognition Section" and include it in your references.

2. There is another study I did not see referenced that specifically looked at Taylor Yard.

In 1992 we got a grant from the California Department of Water Resources' Urban Streams Restoration Program to conduct a study in partnership with FOLAR.

1

2

The grant was established to encourage agencies and municipalities and government entities to partner with environmental groups for a common good.

The study was finalized in 1993 and is called "Multi-use Study on the Los Angeles River at Taylor Yard" It was prepared by consultant Robert Bein, William Frost & Associates (at that time they were in Irvine) and Bill Wenk was a sub-consultant on that study. (I see his name listed in the "Document Recipients" of your Report.)

The concept was to utilize Taylor Yard as peak-shaving/detention of flood flows in the LA River to mitigate the flood threat to downtown that was identified in the LACDA Planning Study underway at that time.

The detention was "tiered" to have 3 levels of uses, the lowest area being for wetland restoration. Unfortunately, I loaned my copy to someone who never returned it and I was left with just the Technical Appendices.

I am pleased to see Taylor Yard on the cover of your report and wanted to bring your attention to this study for consideration in your final plans.

Comment: Please obtain a copy of this study and discuss the feasibility of its recommendations in your report and include it in the References Section.

Question: Would the proposed improvements in your plan at Taylor Yard provide flood mitigation to downtown LA that was identified in the LACDA Planning Study in addition to ecosystem restoration?

Thank you for your consideration,



Michael Anderson | Senior Engineer

Public Works-Capital Projects Management | City and County of Denver

720.865.3023 Phone

[Mike.Anderson@denvergov.org](mailto:Mike.Anderson@denvergov.org)

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519 Fano Street Unit E  
Monrovia, CA 91016  
626-226-6691  
mike.antos@ucla.edu

November 16, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dr. Axt,

I appreciate the opportunity to provide my comments on the ARBOR Study for the Los Angeles River. I am writing as a local stakeholder who lives in the greater Los Angeles region. I am also a PhD Candidate at UCLA in the department of Geography.

My research seeks to explain the root causes of successes and failures of Integrated Water Management efforts in California. Through this research I have come to understand the significant value of a strong vision in integration efforts. Because Alternative 20 is by-far the most integrated vision of a revitalized Los Angeles River, **I am eager to have the Army Corps select Alternative 20 as the final recommended Alternative.**

Today, we know that the Los Angeles River we have is insufficient to our 21st century needs. Undertaking the ARBOR Study with a large group of local stakeholders has been an extremely important step in moving towards a Los Angeles River that provides integrated benefits. Alternative 20 places the US Army Corps at the forefront of envisioning a Los Angeles with revitalized urban habitats, sustainable local water supplies, and a strong ethic of integrated solutions.

The pilot work the US Army Corps of Engineers has undertaken in the Santa Ana Watershed with “watershed based budgeting” is a very important step forward for the Corps. It is my hope that some of the principles enunciated in that effort could be engaged in the selection of the appropriate Alternative for the Los Angeles River. The calls for Alternative 20, echoed throughout the Los Angeles Region, seems a quintessential example of local project priorities.



Please pass my personal thanks to your entire staff that was engaged in this effort. You and your team should be very proud of the ARBOR Study. And when Alternative 20 is selected, I look forward to seeing how the Corps and local partners work collaboratively to achieve integrated benefits. The LA River will become known the world over of what can be accomplished by strong partnerships following an expansive and sustainable vision.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Michael A. Antos". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Antos".

Michael A. Antos

Steven Appleton  
 2426 Meadowvale Ave. No.3  
 Los Angeles, Ca 90031  
[steven.evrnc@gmail.com](mailto:steven.evrnc@gmail.com)  
 310 740 7294

R. Axt, Ph.D.; Chief, Planning Division  
 U.S. Army Corps of Engineers, Los Angeles District P.O. Box 5327  
 Los Angeles, CA 90053-2325  
 ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Ms. Axt,

As an elected (but unpaid) official representing the Elysian Valley Riverside Neighborhood Council as its President I have spent considerable time over the years involved with the Los Angeles River. I am a professional artist by occupation and over 13 years ago I placed waterwheel (by permit) into the LA River for a short exhibition that involved using the waterwheel to filter and bottle water ("50 Bottles of Clean LA River Water".) Recently when the Trial Rec Zone opened in Elysian Valley I formed a local business to provide interpretive kayak tours of the river ([lariverkayaksafari.org](http://lariverkayaksafari.org).) I live right next to the river and am involved on many levels with stewardship of the Los Angeles River.

I am writing to make comments on the Los Angeles River Ecosystem Restoration Feasibility Study ("ARBOR Study".) Before I get into details of my comments I want to commend you and the Army Corp for undertaking this study and for the efforts you have made to present the study to the public and provide opportunity for feedback.

Comments:

**1. Future Public Involvement:**

Once an Alternative has been formally chosen and further detail design ensues, I urge you to form anew a River Restoration Advisory Design Committee that will be brought in early to review, make comment and communication with local stakeholders about progress of plans.

**2. Prioritization of Plans:**

Once an Alternative is selected I urge ranking of plans related both to their Habitat Connectivity impacts and their feasibility. Where issues may exist with real estate acquisition and clean up (Taylor Yard and even more Piggyback Yard,) other more immediately feasible plans should move forward. A new rubric should be considered that ranks immediate feasibility.

**3. Habitat Connectivity Between Elysian Park and LA River:**

Elysian Park, the second largest park in Los Angeles, aligns with the habitat-rich section of the river in Elysian Valley. I urge consideration of habitat connectivity opportunities between Elysian Park and LA River. I offer two scenarios that are both feasible and likely "good buys:"

a. Acquire the 4 acre parcel across from G2, (“Bimbo Bakery Parcel”) which has an owner who is a willing seller. Other undeveloped parcels also align here (such as the “Public Storage” open lot.) By a small scale pedestrian bridge this west bank park could be connected to Taylor Yard, creating a “bulge” of river centered parks. Connection to Elysian Park possible via greened Blimp St (with possible additional acquisition of three lots to expand the park) and tunnel under 5 freeway to Riverside Drive, Riverside Drive connection to Elysian Park Expansion via ped bridge or lighted crossing. Acquisitions mostly involve willing sellers, limit clean up, possible fold in with economic development and utilization of rights of way already owned by City, County or State.

b. Create a pedestrian/wildlife bridge from the base of the current Riverside Bridge (soon to be torn down) over the relatively narrow span of the 110 freeway directly to trails of Elysian Park. This is the shortest span bridge of any referenced in the Arbor Study but would produce substantial habitat connectivity and public access between Arroyo Seco, LA River and Elysian Park.

*(Note: I am well-aware that these proposals may not fit within the scope of the Army Corps restoration efforts, except to the degree they might involve improvements of trails and points of connection such as contemplated in Griffith Park. These proposals would require local sponsor, City of LA, participation in acquisitions and or pedestrian bridge or tunnel.)*

#### **4. Chain Link Fences are Incompatible with Local Rules and Aesthetics.**

In many locations of the ARBOR study plans describe providing “chain link fencing.” Chain link fencing is incompatible with local aesthetics as well as pending City of Los Angeles “Rio Plan.” I urge all subsequent design and planning to reference local aesthetics and standards as well as any possible City of LA Planning Documents pertaining to fences and boundaries at river's edge.

#### **5. Lack of Defined Public Access to the River from Pathways:**

None of the alternatives specify direct access from Bike and Pedestrian Pathway to the LA River. I am especially concerned about Reach 6. Without substantial modification or additions the plan may actually have the affect of blocking access to river's edge from LA River Bike and Pedestrian Pathway. Since paths are also to some degree habitat paths I submit that this issue needs to be carefully considered.

Many parcels in this area currently hold fee ownership of portions of land in the LA River with their titles only restricted to providing LA County Flood Control District an “easement for the purposes of flood control.” Arguably, owners of these properties have perfectible rights to access the river for activities that do not interfere with flood control function. Due to these facts as well as a general lack of governmental attention to the LA River for many years, generations of people in this community have accessed and utilized the river for recreation. Reach 6 has also played a very important role in increasing public stewardship of the LA River via various clean up efforts and participation in the Trial Rec Zone. It is a Reach of the river that is accessible not only to immediate residents but also from major freeways, streets and multiple districts.

Based on all of the above, I urge that further design carefully consider how to provide habitat paths and access points (longitudinal and crossing) along the river especially in Elysian Valley.

These issues require special attention given the fact that the local community utilizes its LA River access as a key element of its health and well-being. Continued and improved access would be consistent with Executive Order 12989.

**6. Possible negative Impacts of Increased Public Use of Substandard Pathway:**

In Reach 6 the Bike and Pedestrian Pathway is only 13' wide. Due to a scatter of ownerships and easements it is not viable to enlarge path width on the side of the path facing residences and businesses. Since all parcels of land along this Stretch extending into the river itself prior to channelization, the constrained borders are a direct result of choices made about where to cut channel border. Landscape borders, habitat pathways and recreational path widths are constrained as a direct result of the historical channelization activities that occurred in the 1940's whereas subdivision of land occurred in 1922. Issues with appropriate flood capacity are technically feasible to manage within the scope of proposed restoration, especially because the proposed widening of the channel at Taylor Yard gives some engineering flexibility. I submit that terracing, widening or cantelievering over towards the river is both an appropriate and feasible restoration.

Increased public use is likely to result from restoration efforts, with possible negative impacts on local community. I urge consideration of ways to provide additional path width or parallel seasonal terraces running along the river.

**7. Concern over Vertical Walls as a Method of River Widening at Reach 6:**

ALT 13, describes changes to Reach 6 as follows-

**“Reach 6** – The main channel would be reconfigured and widened to take advantage of the Taylor Yard ‘Bowtie’ parcel. This section of the channel (the ‘Bowtie’ parcel) would be widened on the left bank to allow an increase in the channel invert width and to set-back the channel slope to meet the original ground elevation. Planter boxes would be built into channel walls on the right bank for vegetation planting/establishment through the entire Reach. Riparian planting and restoration of riparian habitat corridors out of the channel along the top of the bank would be implemented. **Trapezoidal walls in this reach would be reshaped to vertical to increase channel invert width.** Channel geomorphology would be rebuilt in this reach to provide habitat features and flow regimes supportive of in-stream biota.” (from AppADesign.pdf, page 67)

The bold typed section causes me great concern. I have inquired with both local City staff and with Army Corp staff about this . They report there will not be an reshaping of trapezoidal wall to vertical in Reach 6. Possibly, this is an error in the text. None of the cross-sections or renderings in Reach 6 indicate vertical walls being employed here.

If such walls were to be employed it would negatively impact on public safety on the much used pathway. It would also disrupt movements of animals (other than birds) and limit public access by residents and others to the river (see # 5 above.) Finally such a method of river widening would harm various recreation and interpretive businesses that have been formed by locals as an outgrowth of the Trial Rec Zone.

## 8. Error in Written Description :

Note that page 44 of AppADesign.pdf states:

**Preliminary Channel Design** – As seen in Figure 4.14, “Cross-Section 6b, Glendale Freeway to Interstate 5,” the proposed design would replace the existing channel’s grouted rock or concrete paved 3H:1V slopes with TRM, topsoil, and vegetation on the left/east bank and the widened right/west bank. The right/west top of bank would be widened by 316 feet to provide room for the construction of wetlands.

In other locations and based on public presentations, I understand that the left/east bank of the river will be widened NOT the right/west bank.

## 9. Technical Concerns with Proposed Wetlands in Taylor Yard:

I am concerned that in high velocity storm situations the river will carve into the soft slope and deposit sediments, most likely on the east bank. My primary concern is that sediment deposit may strand the wetland water east of the river so that it eventually dries up and that such deposits may also isolate wetlands from the river flow.

I have personally observed a location along the Taylor Yard proposed wetlands where water springs from the ground. I suggest careful examination of these springs. Possibly spring waters from the site can provide a source of water for the proposed wetlands. Wetlands at a strategic height above the river flow could be filled with spring waters but also connect to the river by occasional inflows and constant spring water infiltration and runoff.

## 10. Proposed Wetlands and Vector Control:

I am the City of Los Angeles Trustee to the Greater Los Angeles Vector Control District. In that role I have become aware of the ongoing issues with West Nile Virus in Southern California. I urge that all wetlands development be created in consultation with Scientific and Operations Staff of the Vector Control District. It is in the public’s interests to construct wetlands projects in such a manner that vector control issues are managed properly so as to avoid need for future use of spraying in habitats.

## 11. Final Comments:

Overall, I want to comment that local residents to Los Angeles are faced with a complex situation in trying to respond and provide public comment to this study. Several levels of government are involved in this process. Local City of Los Angeles elected officials as well as most non-profit entities and business groups have focused their efforts on advocacy for Alternative 20, the most costly and rich of the Alternatives. In many ways, I echo and support the consensus position of Los Angeles: Alternative 20 is the most complete and full plan which goes farthest to creating connectivity and economic parity in terms of the spending of local sponsors and Army Corp.

However, in this advocacy process there may not have been sufficient attention to considering the detailed design elements of the various plans. I am aware that there is much detailed planning and design to go, with plenty of chance for public feedback but it seems best to me to register some specific design concerns now. My comments address a few specific concerns, urge prioritization and analyze “connectivity” with a mind toward parity and fairness. In one case, I have proposed a new design



possibility (connections between Arroyo Seco, LA River and Elysian Park.) I urge that as this process moves forward that design process not be closed to ways that the most immediate, equitable and cost-effective benefits can be achieved.

Thank you again for the efforts of the Army Corp and as a river community member I look forward to our future work together.

Sincerely,

A handwritten signature in black ink, appearing to read "S Appleton", with a stylized, cursive script.

Steven Appleton

**From:** [Robert Aronson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please choose Alternative 20 as the Taylor Yard G-2 Parcel Restoration Plan  
**Date:** Friday, October 11, 2013 7:55:21 PM

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Hi Dr. Axt,

I am writing to ask that the Corps please re-evaluate the TSP for the habitat restoration of Taylor Yard, and choose Alternative 20 instead of Alternative 13.

We only have one opportunity to get this right, and Alternative 20 is far superior to the other alternatives.

Thank you for considering my opinion.

Robert Aronson  
108 Catamaran Street #1  
Marina del Rey, CA 90292-5708

**From:** [PHYLLIS BABILA](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [pbparlor@juno.com](mailto:pbparlor@juno.com); [kflores@FOLAR.org](mailto:kflores@FOLAR.org)  
**Date:** Friday, November 15, 2013 10:21:33 PM

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11/15/2013 the LA RIVER COMMENTS link on your petition for alternative 20 doesn't open....I will not sign Garcetti's page (don't like him/press monger, too much face) I live by the LA River 12 years, and the concrete walls/ embankment are a BAD IDEA....tagging, grafitti, skribble, & there is NOT enough "good traffic" to deter the bad traffic who hang there & deface property, dump, start fires, drugs & alcohol.... (Atwater Village) \* Garcetti's office/Angela Motta ignored requests & told me to maintain a trash can there for the garbage/dumping.... also can't get the cops to TICKET illegal parking by the Acresite Gate and nobody really responds good enough to the needs/care/prevention of the East bank/LA river between Hyperion Bridge & Fletcher Bridge....the wild life needs to be protected & the river cleaned, some "signage" would help too .....what ever alternative 20 is it's got to be better than who ever is suppose to be maintaining it now (Marine corp.? heard they mess up a lot) even the councilman's office staff La Bonge/Garcetti don't know who maintains it.....my vote is w/ FOLAR for alternative 20.....

**From:** [Felicia Bander](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] the new plan for the L.A. river  
**Date:** Friday, October 11, 2013 6:24:38 PM

---

Must include work done on the steep banks of the river so that the public can gain easy access.

**From:** [mbanner1954@yahoo.com](mailto:mbanner1954@yahoo.com)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Michael Banner](#)  
**Subject:** [EXTERNAL] LA River Revitalization  
**Date:** Tuesday, November 19, 2013 11:56:04 AM

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Alternative 20 is far superior to Alternative 13 for the following reasons:

CHAP is only one tool that should have been used to value the habitat  
Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)  
Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains  
Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections  
Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh  
Cornfields provides connection to the Elysian Park  
Reduction of distances between the habitat nodes greatly enhances the value  
It is more similar to the ecosystem that historically existed prior to the channel  
The length of area restored is 2 times greater (6.4 miles vs. 3.2)  
More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)  
Creates 131 more acres of restored habitat (719 vs. 588)  
The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes  
More likely to be sustainable and resilient over the life of the project because of the size and added connectivity  
Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives  
Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly  
The Regional Economic Development analysis shows Alternative 20:  
Provides 7015 more jobs and \$386 million more in wages during construction  
Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term  
Creates 1094 more new permanent jobs valued at \$62 million more  
The Other Social Effects analysis shows Alternative 20 with its larger scope will:  
Produce a greater connectivity with the people and communities  
Reach more of the census tracts with high poverty and high minority populations  
Provide more green areas to encourage physical activity  
Provide more green areas to reduce air quality effects  
Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons.  
We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Michael Banner  
Sent via BlackBerry by AT&T



**From:** [Lane Barden](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alt 20  
**Date:** Monday, November 18, 2013 4:34:44 PM

---

Dear Ms. Axt,

As a river activist and artist involved in the movement to restore the Los Angeles River for more than 16 years, I'm writing in support of Alternative 20.

While this option may seem expensive, it is actually far from transformative in terms of it's total impact. It is also worth noting that the return on a project like this is incalculable, and the revenues it will create will more than pay for it over time.

I would also point out that urban rivers have been restored county-wide, and no city has waited longer than Los Angeles for significant change. The movement to restore the river began almost 30 years ago. There will not be another chance any time soon to get this right. Please do the right thing and support Alternative 20.

sincerely,

Lane Barden

Lane Barden  
2450 Daly St. #4  
Los Angeles, CA 90031

Lane Barden Photography  
213.804.5415  
[www.lanebarden.com](http://www.lanebarden.com)

blogging at [www.lanebardenwaystation.com/](http://www.lanebardenwaystation.com/)

**From:** [Urte H.Barker](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Friends of LA River](#); [Nancy L.C. Steele](#)  
**Subject:** [EXTERNAL] LA River Study Comment  
**Date:** Sunday, November 17, 2013 12:50:45 PM

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Dear Dr. Axt:

My name is Urte Barker and I am a retired Chemical Engineer. I have worked for many years on environmental clean-up and restoration projects for a major energy company at sites all across the United States. One of our main goals was to not just clean up the pollution left behind by many decades of industrial activity, but also to reclaim civic resources in the communities where the companies had operated. I have lived in Los Angeles for nearly forty years and the absence of green space within the central Los Angeles area and the lack of a potentially vibrant access to the riverside has always been incomprehensible to me. Given our climate and outdoor life style that Los Angeles affords in other parts of the basin, we owe it to our community to make the most of this wonderful resource! Alternative 20 goes along way towards creating true breathing space in the dense urban landscape that is downtown Los Angeles.

We should look at this LA River restoration opportunity in the broadest perspective possible and make a solid investment in the future! Since we are not dealing with fixing a river control problem, but rather with a re-conception of the LA River's role in the social, civic and environmental life of the LA metropolitan area money along should not be the deciding factor. I therefore strongly support the Alternative 20 as the right course of action.

In addition, I agree with the comments submitted by the Friends of the LA River.

Please support our community with a wise decision and choose Alternative 20 as the path forward!

I appreciate your efforts and consideration of comments.

Sincerely,

Urte Barker

Urte H. Barker  
[udbarker@ix.netcom.com](mailto:udbarker@ix.netcom.com)  
626.577.9784 (H)  
626.379.7471 (C)

**From:** [Geoff Barnett](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] RE: Los Angeles River Feasibility Study Alternative 20  
**Date:** Monday, September 23, 2013 4:07:24 PM

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Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, California 90053-2325

Dear Ms. Axt,

I'm writing this letter in response to the U.S. Army Corp of Engineers Los Angeles River Feasibility Study. I stand with Councilmembers Mitch O'Farrell and Gil Cedillo in support of Alternative 20 to the plan.

I believe that Alternative 20 is an important opportunity to breath new life into the Los Angeles River Valley, and to restore precious ecosystems that have suffered the consequences of many years of mistreatment and neglect. As a local resident, I'm also enthusiastic about the prospect of being able to share the river with my family, friends and neighbors. This plan is an incredible step towards remaking Los Angeles into the vision of a truly modern city, which can serve as a beacon of progress and modernity throughout the United States, and the world at large.

Thank you for allowing the community a voice in this process. I hope this will be considered when making a determination on the future of the LA River Valley.

Sincerely,

Geoff Barnett  
Resident, Atwater Village

**From:** [SallyBarn@aol.com](mailto:SallyBarn@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Devil's Gate  
**Date:** Sunday, November 17, 2013 3:48:05 PM

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I am greatly concerned about the proposed County excavation of the Devil's Gate Dam area.

The proposed destruction and impact on human and animal life is overwhelming.

Please down-scale the project. Where is the money to accommodate this project at this time? Is it really critical? or is there an agency just wanting to justify their existence and maintain their salaries?

Sally Longmoor Barngrove

**From:** [Victor Migenes](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L A RIVER RESTORATION....  
**Date:** Saturday, November 02, 2013 10:05:11 AM

---

I am a native to the L.A. RIVER AREA (LOS FELIZ) and i use the bike path weekly for over 30 years...  
i love the current changes and the trend to completey restore the river. The so called "ALTERNATIVE  
20" is most usefull for transforming the river in its many capacities for both human and natural animal  
usage.  
thank you,

VIC BARON  
P.O.BX 411154  
L.A.CA. 90041



**From:** [Brandon](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA river  
**Date:** Saturday, September 14, 2013 12:49:17 PM

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Hi,

Please take this opportunity to really make something out of this project. This is an asset for the city and we cannot take for granted what this will do for the city and the state. Los Angeles is truly a beautiful city and we need to make sure that the investment in this project is done right.

All the best,

Brandon

Sent from my iPad

**From:** [Alek Bartrosouf](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative 20  
**Date:** Tuesday, November 05, 2013 2:08:18 PM

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Dear Army Corps,

I holeheartedly support Alternative 20. I stand with Glendale City Council, Los Angeles City Council and Mayor, and many local state and federal representatives who realize the outstanding benefits that come only with Alternative 20's proposal. As a Glendale resident who works in Los Angeles, I see the great potential in creating an urban fabric using the river as its backbone. Connecting people to the river can be accomplished best with Alternative 20. LA has made great strides in increasing connectivity to the river, a natural gem and a habitat that has a lot of room for improvement. This alternative will only help realize the ultimate goal of bringing the river back to its natural state as possible.

Please adopt Alternative 20.

Alek Bartrosouf  
302 N. Louise #11  
Glendale, CA 91206  
818 359 0108

# Russell Bates

2359 Lake View Ave.  
Los Angeles CA 90039  
(213) 985-7505

9/28/13

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, California 90053-2325

I am writing to express my strong support for **Alternative 20** for the LA River Ecosystem Restoration project.

**Alternative 20** is endorsed by the City of Los Angeles, and I appreciate my city's leaders making this wise choice.

While Alternative 13 contains many worthy elements, it does not provide the level of restoration that the LA River deserves. We have an opportunity here to make a dramatic, life-changing improvement to a huge section of Los Angeles. We shouldn't waste it.

Please join me in supporting **Alternative 20!**

Sincerely,

A handwritten signature in black ink, appearing to be 'RB' followed by a long, sweeping horizontal line that extends to the right.

Russell Bates

**From:** [susannabattin@alum.calarts.edu](mailto:susannabattin@alum.calarts.edu) on behalf of [Susanna Battin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Study- SUPPORT FOR ALTERNATIVE 20!  
**Date:** Monday, November 18, 2013 12:09:56 PM

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Dear Josphine R Axt,

I am writing to emphasize the importance of choosing an LA river restoration plan that enables public and environmental health across LA. To adequately do this, we must select a plan that removes more concrete, creates more habitat, connects important corridors, and conserves more open space. From my research, I find that Alternative 13 does not do this. Alternative 20 is the only plan that will create the future LA we envision and strive for.

Thank you for listening, please consider this seriously,

Susanna Battin

LA resident

213 858 7077

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

November 18, 2013

Dear Dr. Axt:

My name is Edward Belden, resident of Los Angeles County and small business owner in the City of Los Angeles. I am an avid nature lover, urbanite, and promoter of sustainability. My passions and love for the outdoors are coalesced in the existing and potential habitat of the Los Angeles River. I have enjoyed riding my bike, kayaking, and bird watching along the LA River for more than eight years! I hold a BS in Biology and a Masters in Environmental Science and Management and recently started a small business in Los Angeles (Peddler's Creamery). I previously worked for the Council for Watershed Health as the Water Programs Manager and briefly participated on the advisory committee for the Los Angeles River Ecosystem Restoration Feasibility Study. I am writing in support of the Alternative 20 of the study as it is the best alternative for achieving true ecosystem restoration by providing much needed additional habitat and connectivity throughout the region.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

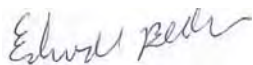
- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains



- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,



Edward Belden  
 Owner, Peddler's Creamery  
 458 S. Main Street  
 Los Angeles, CA 90013

**From:** [Benoit, Jason](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Restoration Project  
**Date:** Monday, November 18, 2013 8:29:26 AM

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To Whom It May Concern:

As a resident of Los Angeles County and someone who works firsthand to improve the natural environment in our area, I strongly encourage the U.S. Army Corps of Engineers to choose ALTERNATIVE 20 for the Los Angeles River Ecosystem Restoration Project. The tentatively selected Alternative 13 falls far short of achieving meaningful transformation in our degraded urban watershed.

Please reconsider your tentatively selected plan and instead choose the more comprehensive ALTERNATIVE 20.

Thank you,

Jay Benoit  
Director, The School for Environmental Studies at John Marshall High School  
3939 Tracy Street  
Los Angeles, CA 90027

**From:** [Anthony Bevilacqua](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In Support of Alternative 20  
**Date:** Sunday, November 17, 2013 12:09:36 PM

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To USACE of Los Angeles,

I strongly support and encourage all involved parties to approve Alternative 20 to enhance habitat, recreation, and social connectivity along and across the Los Angeles River. LA needs this river for too many reasons to mention, but I'll list a few here; many people living close to the river not only have no access to the river but they have little to no access to safe parks and/ or open space close to home.

The more habitat the better. Can you imagine how many more birds and wildlife the river could support if Alt. 20 is enacted? As habitats everywhere are being reduced, here we have a chance to restore a significant chunk of this tortured river.

Finally, the river in its current cement and inaccessible state isolates people and communities from each other. This is another barrier that can be broken with major river restoration and increased access. Money should not be the issue, now is the time, and this could be one of the greatest projects on the West Coast in some time if we choose Alternative 20. Please listen to the people of Los Angeles and it's Mayor, we don't want Alt. 20, we need it!

Sincerely, Anthony Bevilacqua

**From:** [Rjbilson@aol.com](mailto:Rjbilson@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] support for alternative 20  
**Date:** Wednesday, October 16, 2013 9:25:29 PM

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To whom it may concern:

I strongly support, as do elected officials at many levels of government, that the best long term solution would be to adopt Alternative 20 for the restoration of the LA River and the LA River Watershed.

Alternative 20 removes more concrete which will lead to the creation of habitat, restoration of wetlands that will encourage the return of wild life and, just as important, provide access for the public to the river, a sorely needed requirement for the citizens of Los Angeles and the San Fernando Valley.

The highly degraded Los Angeles Watershed must be restored not only for the above obvious reasons but also for the unforeseen benefits to future generations to come. Alternative 20 is best suited to these objectives.

The scope of restoration within Alternative 20 will not come around again. If the opportunity to go with Alternative 20 is not recommended and adopted by the Corps, it will be too late to say "I wish we had chosen Alternative 20 instead of Alternative 13."

Please listen to all those who support Alternative 20.

Sincerely,

Renne Bilson, 12505 Sarah St., Studio City, CA 91604

**From:** [Ava Bise](#)  
**To:** [SPL Comments LA River Study](#); [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] LA River Study Comments  
**Date:** Sunday, November 17, 2013 9:57:02 PM

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TO: Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District

ATTN: Ms. Erin Jones, CESPL-PD-RN

FROM: Ava Bise  
3515 Griffith Pk. Bl.  
Los Angeles, CA 90027

I was born ( in 1952) and raised in Los Angeles, and have been a resident of Los Feliz since 1984. I am writing to voice my support of Alternative 20 that is under consideration by the U.S. Army Corps of Engineers among other less ambitious plans.

I am gratified that so many elected representatives are supporting this more rigorous and comprehensive plan to restore part of the LA River. We owe it to the residents of Los Angeles to do all we can to recreate a lost river treasure. The efforts of the community based group, FoLAR (friends of the L.A. River) have already yielded visible improvement in our sightings of birds along the river near where we live near Los Feliz Blvd. With the full resources of the Army Corp, amazing progress will be achieved. This is a well-populated area of Los Angeles, and as a result, the lives of millions of children and adults will be enhanced in addition to native plants and animals.

I was struck by the sight of herons when I was at the Lewis and Clark National Historic Trail Interpretive Center in Great Falls, Montana this past Summer. When I asked the park rangers about the birds, they said their landings resumed after restoration efforts were completed along the river, and that those birds migrate through Southern California. Seeing those majestic herons reminded me that restoring the LA River is relevant to our whole country. Just as Montana moved forward, the LA area needs to do our utmost to heal this long-neglected habitat and potential recreational area. Thank you for your consideration.

Ava Bise



**From:** [ul Bosler](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] FOLAR's endorsement of ARBOR Alternative 20  
**Date:** Saturday, November 16, 2013 1:19:49 PM

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Dear Corps,

I am a volunteer docent with the Audubon/Ballona School Program which has been in existence for almost 20 years. We docents have over the past 6 years visited the FOLAR headquarters several times and had tours with Shelly Backlar. I have always been impressed with not only the rehabilitation but the expertise of the individual staff members, many of whom are volunteers like me.

Since we lead tours at the end of a tributary of the LA River, Ballona Creek, (used to be the LA River estuary) we are most interested to know about the health and future plans for this important waterway.

I am sure that the proper choices for rehab now will effect the future of the precious few acres of wetlands at our end.

I support wholeheartedly the Alternative that FOLAR and the Mayor are advocating.

Thank you very much,

Lynn C. Bossone  
Culver City

Fabienne Bouville  
3837 Brunswick Ave  
Los Angeles, CA 90039

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, California 90053-2325

Dear Mrs. Axt,

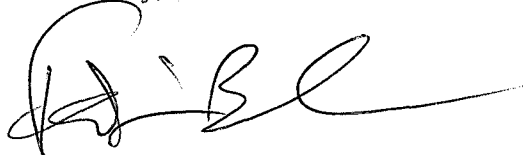
RE: Los Angeles River Feasibility Study Alternative 20

I'm writing this letter in response to the U.S. Army Corp of Engineers Los Angeles River Feasibility Study. I stand with Councilmembers Mitch O'Farrel and Gil Cedillo in support of Alternative 20 to the plan.

I believe that Alternative 20 is an opportunity to breath new life into the Los Angeles River Valley, and to restore precious ecosystems that have suffered the consequences of many years of mistreatment and neglect. As a local resident, I'm also enthusiastic about the prospect of being able to share the river with my family, friends and neighbors. This plan is an incredible step towards remaking Los Angeles into the vision of a truly modern city, which can serve as a beacon of progress and modernity throughout the United States, and the world at large.

Thank you for allowing the community a voice in this process. I will be attending the October 17th public meeting to reiterate my opinion, and hope this will be considered when making a determination on the future of the LA River Valley.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Bouville', with a long horizontal flourish extending to the right.

Fabienne Bouville  
Resident and homeowner, Atwater Village  
Tel: (323) 304 9341  
Email: fbouvil@yahoo.com

**From:** [paul bowers](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Place to row  
**Date:** Monday, November 18, 2013 6:09:03 PM

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Dear Dr. Axt:

My name is Paul Bowers. I have lived in Echo Park very close to the LA river for 15 years and my 2.5 year old son lives even closer in Atwater Village. I am a former LAUSD elementary school music teacher and community activist. I am also paraplegic as a result of a spinal cord injury I sustained in a motorcycle accident. I have traveled to destinations from Long Beach, CA to Boston, MA to row as it is a great form of recreation and rehabilitation. It is one of the best ways to stay fit for persons with SCI and everyone else as well. I feel the LA river offers a unique opportunity to create a great environment for rowing here in LA. I have witnessed the amazing work being done with students, the disabled and others at Community Rowing in Boston and would like to see us emulate their success here. The future development of the surrounding neighborhoods would also be enhanced by the major environmental improvements that would result from more serious investment. I am dedicated to creating a better balance of our environment and urban community.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River. Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)

- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:

- Provides 7015 more jobs and \$386 million more in wages during construction
- Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
- Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Paul Bowers  
323-665-1581  
323-337-2033

**From:** [William Preston Bowling](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] ARBOR Comments  
**Date:** Monday, November 18, 2013 1:02:47 PM

---

Hello,

Please select alternative 20 as it uses the majority of the soft bottom section of the Los Angeles River including the area of the new "Water Wheel" at Spring Street that will take LA River water into the Los Angeles State Historic Park (Cornfields).

William Preston Bowling  
Sent from my iPhone  
310-428-5085



**From:** [Maya Brenner](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] support for Alternative 20  
**Date:** Monday, November 18, 2013 2:46:55 PM

---

Hi-

My son is a 4th grade student in Los Angeles. He has been learning about the proposed LA River project.

We both believe that Alternative 20, instead of Alternative 13, would be better for the Los Angeles ecosystem, environment, and community at large.

We live very close to this project and would be so excited to use it once it is complete.

thank you for your time,

Maya Brenner  
Jack Einziger

Please note this is my new email.

**From:** [Daniel Brotman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA river revitalization  
**Date:** Saturday, September 14, 2013 9:14:36 AM

---

To whom it may concern,

I am writing to express my support for Alternative 20 supported by Friends of the Los Angeles River. I believe the larger up front investment will pay significant dividends to the economy of Los Angeles for years to come.

Regards,

Dan Brotman  
6211 Murietta Ave  
Valley Glen, CA 91401

**From:** [Lynn Brown](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Restoration  
**Date:** Sunday, November 17, 2013 8:15:48 AM

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To Whom it may concern;

There is not time to bring this before the Board of Equestrian Trails Inc (ETI) or the LA Equine Advisory Committee, therefor I speak for myself only.

Knowing the minds of most equestrians, we support Alternative 20 and the habitat restoration, connecting wildlife corridors and open space preservation contained in Alternative 20.

We support FOLAR's efforts on this issue,

Sincerely,

LYNN BROWN  
LA EQuine Advisory Committee V.P.  
ETI Trail Coordinator Corral 38

**From:** [Svd Brown](#)  
**To:** [SPI Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Saturday, November 16, 2013 1:08:37 PM

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I heartily endorse #20 as the approach. Army Engineers hardly ever see the whole picture.

**From:** [Steve Brye](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] FW: Letter of Comment  
**Date:** Friday, November 15, 2013 6:56:33 PM

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**From:** Brye, Steven [mailto:BryeS@metro.net]  
**Sent:** Friday, November 15, 2013 5:12 PM  
**To:** 'bryesteve@att.net'  
**Subject:** Letter of Comment

Josephine R. Axt, Ph.D., Chief, Planning Division, U.S. Army Corps of Engineers, Los Angeles District, P.O. Box 532711, ATTN: Ms. Erin Jones, CESPL-PD-RN, Los Angeles, CA 90053-2325

Dear Dr. Josephine Axt,

Thank you for the opportunity to comment on the Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Study, Los Angeles County, Calif. I am writing you today in my capacity as a private United States citizen and any opinions I might express do not necessarily represent the opinion of my employer nor of any private business, government body or any organization whatsoever, so far as I know.

Some of the alternatives within this Draft Environmental Impact Statement propose the acquisition of the Union Pacific Railroad Yard sometimes known as "the Piggyback Yard" or as the Los Angeles Transportation Center; described, for example, on Page 4-55, Lines 38 to 46 and continuing on Page 4-56, lines 1 to 10. I do not wish to comment on the appropriateness or the feasibility of the proposal to buy the Piggyback Yard. Rather I wish only, strictly as a private citizen, on one aspect of the reuse of the Piggyback Yard if it is purchased.

Page 4-55, Line 4-55 states "The Piggyback Yard site would be restored with 113 acres of riparian habitat. The site appears somewhat larger than 113 acres and the balance of the site would presumably go to the supporting functions of restrooms, trails, parking lot etc. shown in the Draft EIS illustrations.

I recommend that the Final EIS include a commitment of the shared use of a small portion of the total Piggyback Yard site, if it is purchased, for a College or University level center to study the restored wetlands and related higher level educational subjects. The small portion of land dedicated to higher education would greatly increase the utility of the Project to adjacent neighborhoods within East Los Angeles. The youth of local residents could study there. The land so dedicated need not be subtracted from the Riparian habitat, but designed to be integrated within it. 2 acres of land, if accessed by foot, bicycle and any of the many adjacent transit lines and dispensing with auto parking, could support the daytime studies of a few hundred students in biologically sensitive small structures. These students could be all from one university or from several universities sharing the space simultaneously or at different times. Part of the education could be in how to study riparian areas without damaging them.

If a larger portion of land (say 5 to 10 acres) were partly dedicated to higher education it might be possible to have as many as 1,000 or more students there and the functional equivalent of a small college.



The project should not be expected to pay for any of this. It should however commit to reserve this small portion of land for a higher education use, fully compatible with the proposed riparian habitat, as a perfectly suited betterment to the project design and a mitigation for any community impacts during construction. The cost of fully recyclable small scale teaching structures with features like solar power, on site riparian planting and tutoring for younger students would have to be raised outside the project, but might be somewhat comparable to the cost of well landscaped portable trailers such as one might imagine at many elementary schools or high schools throughout Southern California.

Steve Brye  
255 South Grand Avenue  
Apartment 808  
Los Angeles Ca 90012

**From:** [mike budzik](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@foliar.org](mailto:contact@foliar.org)  
**Subject:** [EXTERNAL] LA River Project  
**Date:** Saturday, November 16, 2013 10:32:53 AM

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Josephine R. Axt, Ph.D.; Chief, Planning Division 11/16/13  
 U.S. Army Corps of Engineers, Los Angeles District  
 P.O. Box 532711

ATTN: Ms Erin Jones, CESPL-PD-RN  
 Los Angeles, CA 90053-2325

Dear Dr. Axt:

My name is Mike Budzik, a resident of Glendale CA near the Los Angeles River. I've lived here for over 15 years and enjoy my walks along the river. In a growing city where nature takes a back seat to progress, relaxing near the river provides a welcomed stress relief. I am a college graduate working in the entertainment industry as a production audio technician. I support the Friends Of the LA River because I too believe in the importance of improving the condition, public use and preservation of the LA river. My children have asked while walking along the river why we are not allowed to fish or boat or play in it. My best attempt at answers to them frustrate me and are an embarrassment to this future generation. I know we can create a better balance of our environment and urban community and I am encouraged by examples of other communities where such efforts have had wide sweeping success.

I appreciate the time and efforts the Corps and City of LA have expended to work with the community and prepare the LA River Ecosystem Restoration Feasibility Study and Environmental Impact Report. I am also thrilled that the Corps and City see the benefits in the LA River restoration. I am writing to promote my support of Alternative 20 presented in the document instead of Alternative 13 (identified in your study as the Tentatively Selected Plan). I believe Alternative 13 does not do enough to recognize the importance of the LA River to habitats, species, and the residents of this city.

Alternative 20 will do more that Alternative 13 by:

Providing greater connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)

Providing connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains via the Verdugo Wash

Restoration that removes concrete walls and creates wetlands at Piggyback Yard to increase hydrologic and wildlife connections

Restoration with higher value habitats at Cornfields by terracing the bank and creating freshwater marsh and providing connection to the Elysian Park

Reducing distances between the habitat nodes to greatly enhance the overall value

Creating a similar ecosystem that historically existed prior to the channel

Restoring a length of river 2 times greater (6.4 miles vs. 3.2 in 13)

Removing more than 3 times the concrete (117,918 cubic yards vs. 36,891)

Creating 131 more acres of restored habitat (719 vs. 588)

Creating a higher quality of ecosystem because it restores more natural river connections, rather than using culverts or pipes

Promoting the long term sustainability and resilience over the life of the project because of the larger scope and added connectivity

Meeting more of the 19 performance targets established under the 2 objectives than all the alternative plans (including 13)

Meeting the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly

The Regional Economic Development analysis shows Alternative 20:

Provides 7015 more jobs and \$386 million more in wages during construction  
Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term  
Creates 1094 more new permanent jobs valued at \$62 million more

I urge you to consider Alternative 20 because I believe the long term social and economic benefits outweigh Alternative 13 and the additional investment. Alternative 20 reaches more of the census tracts with high poverty and high minority populations, provides more green areas to encourage physical activity and connectivity to the river, and provides more green areas that will improve air quality. Restoration of the LA River is crucial to my family and our City! I believe the added values of Alternative 20 were not sufficiently considered in the report comparisons. I urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability. I want to explore the river with my children to it's fullest, instead of pointing at it from behind a chain link fence atop a concrete culvert and making up excuses why we cant enjoy it. Thank you for your consideration.

Sincerely,  
Mike Budzik  
spyfilms@earthlink.net

**From:** [Mirella Cabrera](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please choose Alternative 20  
**Date:** Monday, November 18, 2013 3:06:56 PM

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To whom It may concern.

As a resident of Los Angeles country I strongly encourage The U.S Army Corps of engineers to please choose the ALTERNATIVE 20 for the Los Angeles River Ecosystem Restoration project because restoring the half of the LA river would help but if chosen ALTERNATIVE 20 instead of 13 would help the LA river more.

A student from JOHN MARSHALL HIGH SCHOOL .. from AP Environmental science...please

**From:** [Maria Camacho](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative 20  
**Date:** Monday, September 30, 2013 9:41:45 PM

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I support Alternative 20, which envisions the most robust restoration of the L.A. River. The time is now! Don't let the Angelenos down!  
Maria



Alice M Campbell  
355 Canebrake Road, Canebrake  
Julian CA 92036

Comment Letter

TO: Josephine R. Axt, Ph.D.,  
Chief, Planning Division,  
U.S. Army Corps of Engineers,  
Los Angeles District,

FROM: Alice Campbell, PG, CEG, CHg\*  
Speaking as Private Citizen

DATE: November 2, 2013

SUBJECT: Review of: Draft Feasibility Report, US Army Corps  
of Engineers, Los Angeles Office,  
River Ecosystem Study, Which is Not a Flood Study,  
dated September 2013.

+++++

Introduction:

This letter contains my comments on the Draft Integrated Feasibility Report, which includes a Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Study, Los Angeles County, Calif., as generally described above. Thank you for extending the comment period. The USACE (Corps) study, which is **not** a flood study, describes various alternatives to 'beautify' the Los Angeles River, a nebulous and unquantifiable goal. The reach discussed is a stretch of the river between Glendale and downtown Los Angeles. This reach, which is visible from the Golden State freeway and from bridges, has an earthen bottom and concrete banks over earthen levees or berms, except for reaches with vertical concrete walls where the channel is constrained by immovable infrastructure such as bridges, railroads, and freeways. The riverbed is currently choked with vegetation, and the banks are not everywhere in good repair. It is obvious that the area has had little or no maintenance since it was built. The current

USACE Los Angeles River Study, 2013  
November 2, 2013  
Page 2

appearance of the river is not very attractive, but at least it is functioning as a flood control structure, although hampered by the vegetation growing in the open channel.

My comments are mainly related to the Hydrology Appendix. This Appendix is quite different in tone than the front matter of the study, and in many ways actually contradicts some of the conclusions in the main study. Since I would support only the No Project alternative, my remarks focus on the Hydrology Appendix, which does **not** contain a flood study (but actually does).

### Specific Comments:

1. Note how often the Appendix's author states that flood hazards were specifically excluded from the study. Note how the author states that existing channel was not designed for a Corps 100-year flood, but for Los Angeles County's 'capital' flood which comes out to about a 50-year flood (the two kinds of floods are calculated differently between the County and the Corps). (The capital in the name may refer to the county's lack of capital for a 100-year flood control system, and this is all they could afford.) The correct title of the study, if it accurately reflected the hydrology appendix, would be "US Army Corps of Engineers Los Angeles River Ecosystem Study, Which is Not a Flood Study, Just Saying."
2. The Appendix states that FEMA, the Federal flood insurance program, has not updated its maps of this part of the Los Angeles River to show the Corps' calculated extent of the 100-year flood, despite being provided with maps on three different occasions. Because FEMA has not updated the maps, many properties are in a 100-year flood zone and the owners do not know of it. One wonders why, in 20 years, FEMA could never find an engineer and have her spend a couple hours updating 4 or 5 maps and sending them to Los Angeles County. Since FEMA's mission is to protect the people of the US from having to pay out insurance for properties known to be in a 100-year floodplain, it is strange that they would not try a little harder to warn the people living in an area where the USACE, an ordinarily reliable engineering firm, has repeatedly stated that there is a serious flood hazard. It's almost as if FEMA is being prevented somehow from updating their maps. One wonders whether FEMA also had letters from the Corps on flood hazards in and around New Orleans and in the area affected by Hurricane Sandy area before the events, and FEMA similarly **did not act** on the information.
3. Note how the alternatives analysis sidesteps the **100-year** flood protection impacts for the alternatives, instead describing the **relative** flood protection of the alternatives. In essence, the study says, 'well, given the current un-maintained state of the channel (that only gives 25-year flood protection), this or that alternative won't make it any worse, or only a little worse'. This is not the

same as saying that these changes to the river will provide similar or better flood protection than the current design. It is a careful sidestepping of the flooding issue, because the study was **not** a flood study, as the study is careful to point out repeatedly, because the proponents and their vague funders, who are not named, did not want a flood study (why not?).

4. The Appendix shows the 25-year, 50-year, 100-year, and 500-year extent of flooding along the Los Angeles River. It thoughtfully provides maps, although it is **not** a flood study. The Appendix describes how the new maps were created, using computer programs to analyze the volume of floodwater and actually calculated the additional friction caused by vegetation in the river, vegetation that **should not be there** and that is reducing the capacity of the channel to handle even a 50-year storm. This is all present in an appendix which repeatedly states it is **not** a flood study, because, after all, nobody who wanted the beautification study was interested in knowing about whether the whole project would increase flooding along the river. Because FEMA shows it's not in a 100-year floodplain.
5. Any alternatives analysis that honestly included the flooding costs would need to include the costs of flooding of contaminated sites which have been cleaned up assuming they were not subject to 100-year flood hazards, but which actually **are** within a flood zone. A search of public databases for contaminated sites within the Corps 100-year floodplain would have been interesting, but it was beyond the narrow scope of the Corps study. Nonetheless, contamination caused by unexpected flooding is a cost that will be borne by somebody, likely the property owners and taxpayers, who seem to be assumed to be inexhaustible sources of money after such 'totally unexpected' disasters. Technically, a disaster by definition is an 'unlucky' event, but if one has been repeatedly warned that they are doing something that will have very bad consequences, then the outcome is not really a disaster, but a perfectly predictable result of a series of dumb decisions, hoping that luck would dump the consequences on somebody else.
6. Projected dollar costs for the alternatives appear to be unusually low, considering the number of properties along the river that are contaminated by leakage of petroleum products, solvents, plating fluids, herbicides, pesticides, lead, and whatnot. The alternatives analysis does not include the possible costs associated with removal of soils that are found to be contaminated. But in an area that has been industrialized for over 100 years, such contamination is inevitable and is commonly found in highway and other projects along the river corridor.
7. One wonders who might derive the most benefit from this project, given the inherent flood risks that both the current state of the channel, and any modification of the current state, would cause to properties along the river.

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Looking at the last few developments in the area, it seems to me that there is much residential development going in along the river, and that beautifying the river would increase the property values for these developments, so near to jobs in Downtown. So, the likely beneficiary of the beautification would be land developers, who, because of the incorrect flood zoning, can currently build on a 100-year floodplain without doing any expensive mitigation work, then dissolve the LLC and absolve themselves of any responsibility, after selling the development to some unlucky new owner who, because FEMA is bought off or asleep at the wheel, has no idea they are in a flood zone until the flood hits, after which their flood insurance goes sky-high. It seems that there is a wilful neglect, by several layers of local and federal government, of **real** flood hazards, concerted among many agencies to fob legitimate flood mitigation costs off on either FEMA, future buyers, or the State and County who will bear much of the cost of the cleanup after the inevitable and entirely predictable flood.

8. I agree with the anonymous engineer who prepared the appendix. The appendix is a not-so-subtle attempt to protect the USACE, and the engineer herself, from any liability that this project could create. After all, the study did **not** include the cost of mitigation of flood hazards, because the feasibility study was required to **not** acknowledge the flood hazards. The study itself is pretty vague about the source of funding for all the work, which is interesting in itself. The history of environmental studies for dams, levees, and canals in California shows that these studies commonly include vastly inflated 'recreational' benefits to 'justify' the project and drum up taxpayer support, but somehow the taxpayer never gets that value, and some moneyed interest, such as big agriculture, timber or mining interests, actually reaps the main benefit. This seems to underlie the repeated assertion in the Appendix that this is **not** a flood study, because if the true cost was actually known, and everyone was actually being honest about the main benefits going to developers, who will shirk their part of the cost, then the project would not show a benefit to the people of Los Angeles City and County.
9. There is a risk to life from this project which has not been articulated. Every time there is a moderate flood along the Los Angeles River, there are casualties, and swift-water rescues and drownings occur, mainly among the young and irresponsible, homeless, and luckless. A 15-year-old named Adam Bischoff died in a flood during the El Nino year 1992, Earl Higgins died in the Los Angeles River in 1980 while trying to rescue a child, Derrick Ashe and Ray Wells drowned in the Los Angeles River in October 2000. LA's 2010 population was 3.8 million, so the annual risk (really, only the wet-year risk) of drowning is approximately 1 in about 2.5 million population. This is at the current 25-year flood protection level of the River. In a 100-year event, I estimate that the risk will increase about an order of magnitude, so probably 8 or 10 additional lives will be lost, some of whom may be in areas where they did not know they were at risk. The current dilapidated state of the river is simply not being discussed,

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Page 5

which amounts to concealing facts that mature adults can use to make decisions. Should 8 or 10 random people die to beautify the river and increase property values along the river? Is this fair? Who is it fair to?

## Conclusions and Recommendations

1. The study by design does **not** show the true costs of the project in lives lost during the 100-year flood, property damage, damage to historic structures, damage to infrastructure such as roads and bridges and railroads, and the spread of contamination, despite these being impacts of the project. However, to be fair, they are also consequences of the current state of neglect of the River by the County or by whoever is supposed to be maintaining it. Nonetheless, there will be costs in lives lost by flooding along the river, which flood-control structures are expected to mitigate, but not when neglected or deliberately undone to make them prettier.
2. This project is a bad idea, and will end up costing lives and money and leaving people in ignorance of real and dangerous flooding hazards around the river. Furthermore, those responsible should instead bring the channel back to its admittedly inadequate 50-year flood design capacity, and at least save a few lives when the flood hits.
3. The Cities of Glendale and Los Angeles should survey and post flood evacuation routes in the 100-year flood plain as defined by the Corps, so that residents in those areas will know local evacuation routes and not be trapped by flooding. Pretending that there is no hazard, when in fact, this and other studies demonstrate that an unacknowledged hazard exists, is irresponsible, breaks the public trust, and is in fact a malfeasance of public authority.
4. I recommend the project be withdrawn and money be used to repair the flood control infrastructure and security fences along the River, and FEMA update the flood maps so that the real risks of the River be known.
5. Like the author of the Appendix, as a licensed professional I can't support this ill-advised scheme, that benefits only developers and puts its costs on the general population, without clearly stating the real flood risks. The true costs of the project should be borne by those who plan to get rich off it.

Questions regarding this letter should be directed to Ms. Alice Campbell\* by contacting her at 818-717-8366 or 760 765 4862.

\*California Professional Geologist, Certified Engineering Geologist, Certified Hydrogeologist



**From:** [Kay Camphuis](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] in SUPPORT of Alternative 20, attn: Erin Jones  
**Date:** Saturday, November 16, 2013 3:37:02 PM

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Dear Ms. Axt,

Yes, I am a member of Friends of the LA River. So, yes I support Alternative 20. Let's start at the beginning. I moved to Los Angeles from San Diego about 4 years ago when I retired. Not many people move TO Los Angeles to retire and I met many puzzled people when they learned of my decision. Since I've been here I've learned so much about this lovely city and have not regretted my move for a minute. I live about one mile from the river and walk along its edges frequently. There is so much wildlife along the Glendale Narrows, one can only imagine what the entire river might look like if an aggressive project were to go forward. This is the reason I joined FOLAR.

This city, or more to the point, the **people** in this huge city, need parkland, and access to nature on a daily basis. Not everyone can afford vacations away from home, but everyone can enjoy a mini-respite in their own backyard. Whenever I go to a public park, there are lots of people there. This tells me there is a yearning for a connection to nature to restore our bodies and our minds. It's been a long time since our great city has undertaken a project that will benefit everyone, everywhere. Let's not be shy about taking the reins of an imaginative project and actually make it happen. This project really is "for the people", a concept often forgotten. Please.

Kay Camphuis  
3776 Tracy Street  
Los Angeles, CA 90027

[kaycamphuis@gmail.com](mailto:kaycamphuis@gmail.com)

**From:** [Cathy Carpenter](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L A River  
**Date:** Wednesday, October 09, 2013 12:37:34 PM

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Please consider Alternative 20, which is broader in scope and encompasses more restoration activities.  
Thank you.

Cathy Carpenter  
4617 La Barca Drive  
Los Angeles, 91356

**From:** [Juliette C.](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] A plea  
**Date:** Saturday, November 16, 2013 7:52:57 AM

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Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711

Date (letters must  
be mailed no later  
than Nov 18)

ATTN: Ms Erin Jones, CESPL-PD-RN

Los Angeles, CA 90053-2325

Dear Dr. Axt:

My name is Juliette Carrillo and I had the privilege of working with residents and concerned citizens around the LA River in a theater production near Frogtown. The production was called "Touch the Water" and it included stories and current issues regarding the LA River. I am a theater director with a graduate degree from Yale University. I represent Cornerstone Theater Company. Part of our mission includes dedicated to creating a better balance of our environment and urban community.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat

Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)

- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

**Juliette Carrillo**

**From:** [Matt Eysee](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please choose Alternative 20  
**Date:** Monday, November 18, 2013 5:27:41 PM

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To whom it may concern, I strongly suggest that Alternative 20 is the best course of action, for the LA river. The currently selected Alternative 13 falls short of achieving any sort meaningful change for our watershed.

Please choose Alternative 20 to leave a lasting change to LA's river.

-Matthew Aribon Casillano, AP Environmental Science Student

**From:** [Lee Chauser](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River feasibility study  
**Date:** Tuesday, November 19, 2013 9:24:42 AM

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I am taking a course at CSUDH and we are studying the EIR, and my assignment was the "Management Value" appendix. Its an enormous undertaking, and I congratulate you for taking on this renovation. I hope you can bring back the "natural beauty" of the river; eventough it primary concern is safety of the surrounding communities.

Lee H. Chauser  
CSUDH  
Earth Studies Department



**From:** [Stewart Chesler](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Restoration Integrated Feasibility Report  
**Date:** Saturday, November 02, 2013 3:32:57 PM

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Dear US Army Core of Engineers:

I support the Core's Alternative - Alternative 4. It is cost effective, affordable and preserves Union Pacific's Los Angeles Transportation Center Rail Yard (LATC). Los Angeles is home to the largest amount of port traffic and freight activity in the North America. Due to the size of LATC and that fact this is linked to the Alameda Corridor, the spine of Freight movement in Los Angeles, it plays a vital role in both LA economy and the nation's. If LA were to loose LATC, Union Pacific will not be able to replace it and will hurt both Union Pacific and the region as a whole economically. Therefore, I urge the Core to reject any alternative the calls for the elimination of LATC and to select Alternative 4 since its the most cost effective.

Respectfully,

Stewart Chesler, AICP  
Sherman Oaks, CA

**From:** [Edward Colacion](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Yes on PPlan 20!!  
**Date:** Thursday, September 19, 2013 8:41:31 PM

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Yes go with Plan 20 let shave high expectations with high support, this is transformational moment we need to aim for~student, the youth are environmentally grounded with core values that will make this new LA River a huge success..move for ward with Alt.20 Mitch!!

**From:** [Rebecca Conway](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Thursday, October 17, 2013 11:23:36 AM

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I support "Alternative 20" for the L A River.

Rebecca Conway

**From:** [Rebecca Crane](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for Alternative 20 for the LA River  
**Date:** Monday, November 18, 2013 10:08:42 AM

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Dear Dr. Axt:

**My name is Rebecca Crane and I am a Family Medicine physician. I have lived in Los Angeles since 2001 and currently live in Silver Lake. I have two children who I take regularly with me to ride bikes along the river. To have the river, in its current state of wilderness, is a true gift, to have it in my city. The river, like Griffith Park and the San Gabriel Mountains, bring a little bit of wild to the city and give it the spirit that allows my family to thrive in Los Angeles. My children have learned of the city's history and it's ecology through the LA River. My patients have started exercise regimens around activities at the LA River. The river is a vital and beautiful part of my existence in Los Angeles.**

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and **I am providing comments in support of Alternative 20 presented in the document.** While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

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- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City

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- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value

- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

**Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.**

Sincerely,

Rebecca Crane, MD, MPH

**From:** [Ray Cruz](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Aerial Tramway to Elysian Park Point Grandview - Concept Proposal  
**Date:** Tuesday, November 12, 2013 1:35:55 PM

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Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
P.O. Box 532711  
Los Angeles, California 90053-2325

#### Aerial Tramway to Elysian Park Point Grandview - Concept Proposal

From the end of the old Figueroa Street bridge in Los Angeles (slated for demolition) you can see looking south the top of Elysian Park Point Grandview. This concept proposal would be to build an Aerial Tramway from the old Figueroa Street bridge to the top of the Elysian Park hill at Point Grandview.

The tramway would allow visitors to easily ascend to the beautiful resources of Elysian Park and to enjoy several splendid views of the Los Angeles River and other parts of the city. Tramcars should be designed to accommodate bicycles, wheel chairs and people (of all sizes and shapes).

Point Grandview is a hidden gem in Elysian Park Los Angeles. Although I've lived in the Northeast part of Los Angeles nearly all my life, and have frequented this large park many times, not until this year (2013) did I stumble upon Point Grandview while looking for a point to take photographs of the new Figueroa-Riverside Drive bridge currently under construction (construction site immediately below Point Grandview). Other notable view points include Angel's Point and Buena Vista Point.

Looking up from Figueroa Street you can see the palm trees at the top of the hill that provide a signature for Point Grandview. Most people know of Elysian Park because of the Dodger Stadium and the Los Angeles Police Academy that are located in or by this park. There are thousands of people every week who also enjoy its many picnic areas and hiking trails, as well as a few tennis courts, a golf course and other recreational amenities.

The concept perspective is that people who are endeavoring to enjoy the natural scenes of the Los Angeles River should also have easy access to the adjoining natural views and amenities of Elysian Park. Currently the artificial constructions of roads, freeways and river embankments prevent this from happening. The steep cliffs surrounding the north side of Elysian Park also present a natural barrier. How can you get to Elysian Park from the Los Angeles River on foot? Without a tramway of some sort it remains nearly impossible. And yet the two are only a stone's throw apart!

Before we demolish the old Figueroa Street bridge, we should consider this proposal. Although it is possible that a tramway could be constructed from other points along the way, this may be the most proximate and feasible point.

Photos I've taken from Point Grandview and Buena Vista Point can be seen here:  
<https://plus.google.com/photos/102764666155636634799/albums/5932125969207215233?banner=pwa>

Ray Cruz

Mt. Washington, Los Angeles





**From:** [Robert Dawson](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@foliar.org](mailto:contact@foliar.org)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Restoration Integrated Feasibility Report  
**Date:** Monday, November 18, 2013 7:22:43 AM

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As someone born and raised in Los Angeles who lives two miles from the Los Angeles River, I would like to voice my strong support for Alternative 20 of the Ecosystem Restoration Integrated Feasibility Report by the U.S. Army Corps of Engineers.

I believe that Alternative 13 falls short of achieving meaningful transformation of the city's degraded urban watershed. Instead, I strongly endorse the more comprehensive Alternative 20, which removes more concrete, creates more habitat, connects important corridors and conserves more open space for the health of the wildlife and people of Los Angeles.

I appreciate the opportunity to comment on the river revitalization project, and I urge you to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Robert Dawson  
4039 San Rafael Avenue  
Los Angeles, CA 90065

**From:** [Nicolas De Zamaroczy](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comment on L.A. River Study  
**Date:** Saturday, November 16, 2013 5:21:54 PM

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Dear Army Corps of Engineers,

Please select Alternative 20 for the L.A. River Study, per the recommendations of FOLAR.

Thank you.

Best regards,

Nicolas de Zamaroczy

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Nicolas de Zamaroczy  
PhD Candidate, Political Science and International Relations  
University of Southern California  
Los Angeles, CA 90089-0044  
[nicolas.dezamaroczy@usc.edu](mailto:nicolas.dezamaroczy@usc.edu)

**From:** [Nicolas de Zamaroczy](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments on Study  
**Date:** Friday, October 11, 2013 7:27:35 PM

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Dear Army Corps of Engineers,

Please make Alternative 20 your TSP for the LA River moving forward. I believe in the Friends of the LA River and their plan for rehabilitating the LA River.

Thank you for your consideration,

Nicolas de Zamaroczy  
2618 Ellendale Pl. Apt. 7  
Los Angeles, CA 90007

**From:** [Anthony Deptula](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 04, 2013 7:37:21 PM

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Hello,

I'd love to see the river restored back to its beautiful glory. I see Alternative 20 being the best option. Although, slightly more expensive-- I am sure it the fraction of what it cost to to our river into a concrete fortress. The river deserves to be free and I support opening up more locations to bring back some nature to the Los Angeles River.

Thanks so much for your work,  
Anthony Deptula

--

[My new short is a Vimeo Staff Pick!](#)  
[Twitter me?](#)

**From:** [Lauren Deutsch](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] Supporting Recommendation # 20 of the Integrated Feasibility Report, EIR for the Los Angeles River Ecosystem Restoration Study, Los Angeles County, Calif.  
**Date:** Friday, November 15, 2013 11:34:32 PM

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Dear Dr. Axt:

My name is Lauren Deutsch and I have lived in the Los Angeles County region since 1977. I came to Los Angeles from Philadelphia, home of the Delaware and Schuylkill rivers, and was born in northern New Jersey, across the Hudson River from New York City where I also lived, prior to moving to Los Angeles. When I visited New Orleans and St. Paul, I made a pilgrimage to the Mississippi. Rivers are critical to life in the USA.

**I am writing to urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.**

When I first visited downtown LA, I was on Alameda Street and went over the 1st St. Bridge to East LA. I had no idea there once was a river there, but it certainly reminded me of a place where a river *should be*. Then, a native told me the LA River had been paved over, and I had no idea how that could be possible, much less why.

I have volunteered with Friends of the LA River (FOLAR) for a number of years and have marveled at this citizens' initiative to restore the natural habitat of our region. This past year I also began working with Los Angeles Waterkeeper (LA Waterkeeper) and have learned how, tragically, the LA River watershed has become dangerously polluted, particularly in areas where low-income families are able to reside. We also know that the LA River is a critical component of our region's capacity to develop local water resources. Prior to this, I also worked for Global Green USA and the Girl Scouts of Greater Los Angeles. When Girl Scouts was planning the merger of six smaller regional councils into a county-wide nonprofit, I began a campaign to unify our memberships by the theme "A River Runs Through It".

Thus, I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I have reviewed the report in detail, and I am lending my support and endorse the principles provided by FOLAR to this end in **support of Alternative 20 presented in the document.**

- While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River. Major concerns are that the following were not adequately recognized in the selection:
- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City



**Alternative 20 is far superior to Alternative 13 for the following reasons:**

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
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- It is more similar to the ecosystem that historically existed prior to the channel
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- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
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- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
- Produce a greater connectivity with the people and communities
- Reach more of the census tracts with high poverty and high minority populations
- Provide more green areas to encourage physical activity
- Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to me and to all residents of our City and County!  
**The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons.**

I urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Lauren Deutsch

-----

**Lauren W. Deutsch**

lwdeutsch [at] earthlink (dot) net

835 S. Lucerne Blvd., #103

Los Angeles CA 90005 USA

Voice Message: 323 930 2587

**From:** [Toni Devereaux](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Thursday, October 17, 2013 7:35:03 AM

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I support Alternative 20 for the LA River revitalization. After all these decades of neglect, this is not a time for half measures. A vibrant, accessible river will be a centerpiece for our city, putting it in the ranks of other major cities around the world.

**From:** [Joyce Dillard](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments to SPL-2013-003-NLH-Draft IFR for LA River Ecosystem Restoration Study due 11.18.2013  
**Date:** Monday, November 18, 2013 1:52:47 PM  
**Attachments:** 1-Open Space Element.pdf  
 2-Conservation Element.pdf  
 3-Service Systems Element-Public Recreation Plan.pdf  
 4-Ordinance 171353.pdf  
 5-Richard MacNaughton Esq Letter (Housing Element).pdf  
 6-Community Plan Adoption Status accessed 11.18.2013.pdf  
 7-2010 Urban Area Facts (US Census Bureau).pdf

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#### PRIMARY PURPOSE AND NEED:

You state that the PRIMARY PURPOSE is:

The primary purpose of the proposed project and alternatives considered in this Study is to restore approximately 11 miles of the Los Angeles River from Griffith Park to Downtown Los Angeles by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries, its historic floodplain, and the regional habitat zones of the Santa Monica, San Gabriel, and Verdugo mountain ranges while maintaining existing levels of flood risk management.

#### Comments:

The Flood Risk Management is the main concern considering the history of the river of flooding and of meandering. Compton Creek was joined to the LA River through the 1938 paved channeling.

Flooding in the entire City of Los Angeles occurred in 16 times in the last century:

- \* 1914
- \* 1916
- \* 1927
- \* 1934
- \* 1938
- \* 1941
- \* 1943
- \* 1952
- \* 1956
- \* 1969
- \* 1978
- \* 1980
- \* 1983
- \* 1993
- \* 1995
- \* 1998

1

Flooding occurred this century in 3 years;

- \* 2003
- \* 2004
- \* 2005

City of Los Angeles ordinances include:

1. Ordinance 154,405-Specific Plan for Management of Flood Hazards

2. Ordinance 163,913, CF 83-1373-S1-Amending the Specific Plan for Management of Flood Hazards, July 26, 1988.
3. Ordinance 172,801, CF 98-1023-Amending the Specific Plan for Management of Flood Hazards, June 17, 1988
4. Ordinance 178,881, CF 07-0600-S11-the Los Angeles Specific Plan for Management of Flood Hazards (Ordinance 172081) and the National Flood Insurance Program, June 6, 2007
5. Ordinance 180,063, CF 08-0600-S11, Amending the Municipal Code regarding fees, July 8, 2008

City of Los Angeles FLOODPLAIN MANAGEMENT PLAN was approved in April 16, 2010 as an update to the 2001 plan developed with the following purpose:

- (1) identify the City's known flood problem areas;
- (2) establish goals, objectives, policies, and implementation programs to reduce flooding and flood related hazards; and
- (3) ensure the natural and beneficial functions of our floodplains are protected.

Achievement of this purpose is accomplished through reviewing existing studies and plans, the maximum utilization of existing programs and resources involving those most affected by flood hazards in the planning process, and ensuring that the policies and programs identified in the implementation plan are carried out.

Existing levels of flood risk management are based on the approved General Plan and its Elements including Community Plans.

ACCESS TO THE RIVER has been a selling point for this Study by the City of Los Angeles , Open access to the LA River and flood control protection are contradictory.

2

You state:

City General Plans, 2012

General Plans have been prepared for the purpose of guiding and regulating development and protection of land uses within each city that borders the study area, including the Cities of Los Angeles (2012), Burbank (2012), and Glendale (2012). These General Plans, prepared and maintained by the cities' planning departments, have a comprehensive, long-range declaration of purposes, policies, and programs for developing lands and protecting common uses into the future. They provide a comprehensive strategy for accommodating long-term growth should it occur as predicted. General Plans are regularly amended and updated.

Comments:

You are in error regarding the City of Los Angeles General Plan .

The approved General Plan was readopted on August 8, 2001, CF 01-1162 and originally adopted December 1, 1996, CF 95-2259, not in 2012.

The Elements are:

1. Land Use Element Including 35 Community Plans (and adoption status)
2. Air Quality Element adopted November 24, 1992, CF 91-2003
3. Conservation Element adopted September 26, 2001, CF 01-1094 superseding the Open Space Element originally adopted June, 1973 and the Conservation Element originally adopted December, 1973
4. Historic Preservation and Cultural Resources Element (not written)
5. Housing Element adopted August 13, 2008, CF 08-1933 and re-adopted on January 14, 2009, CF 08-1933-S1. The
6. Infrastructure Systems Element (not written)
7. Noise Element adopted February 3, 1999, CF 96-1357 superseding the 1975 Noise Element
8. Open Space Element (June 1973 General Plan)
9. Public Facilities and Services Element (not written)
10. Safety Element adopted November 26, 1996, CF 96-1810 superseding the 1975 Safety Plan, the

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1974 Seismic Safety Plan and the 1979 Fire Protection and Prevention Plan

11. Service Systems Element-Public Recreation Plan (1980 General Plan)

12. Transportation Element adopted August 8, 1999, CF 97-1387 superseding the Scenic Highways Plan adopted in May 13, 1978, CF 98-0894 and the Highways and Freeways Element adopted in 1959

Open Space Ordinance 171,753 was adopted October 14, 1997.

Governor's Office of Planning and Research now requires Complete Streets and Circulation Element and the Community and Military Compatibility, which the City of Los Angeles has not prepared.

Housing Element 2013-2021 has been completed and is pending City Council approval. Final Environmental Impact Report FEIR is an Addendum to the City of Los Angeles General Plan Framework EIR-SCH# 94071030 (1996 FEIR). The City determined that the Housing Element would have no new significant environmental effects beyond those identified in the 1996 FEIR.

There are three lawsuits pending against the Hollywood Community Plan:

1. BS138369 LA MIRADA AVE NEIGHBORHOOD ASSOC OF HOLLYWOOD VS CITY OF L A
2. BS138370 SAVE HOLLYWOOD ET AL VS THE CITY OF LOS ANGELES ET AL
3. BS138580 FIX THE CITY INC VS CITY OF LOS ANGELES ET AL

Richard MacNaughton, Esquire is challenging the City's Housing Element (Council File 13-1389).

You state:

Section 4018 of the Water Resources Development Act of 2007 provided authorization for a "feasibility study for environmental ecosystem restoration, flood risk management, recreation, and other aspects of Los Angeles River revitalization that is consistent with the goals of the Los Angeles River Revitalization Master Plan published by the city of Los Angeles ...." The implementation guidance for this section identified that the scope and substance of the study under the Senate resolution is identical to the study mandated by section 4018 and directed that the ongoing study incorporate the section 4018 study. The feasibility study incorporates, where applicable, conceptual elements and addresses restoration goals from the City's Los Angeles River Revitalization Master Plan.

This feasibility study provides an interim response to the study authority, and the study efforts will determine the feasibility of ecosystem restoration of the Los Angeles River and surrounding environment. There is no sponsor available to investigate flood risk management at this time.

Comments:

LA River Revitalization Master Plan LARRMP does not address Floodplain Management in the Los Angeles County Drainage Area under the current Urban Built dense environment.

The plans are too old to address the current issues. Without proper flood risk management under current conditions and a sponsor funding a study, the Preferred Alternative or any other Alternatives are meaningless.

There are no Plans or Environmental Documents reflecting the current situations to determine feasibility of this Project.

The City of Los Angeles is undergoing RECODE LA, a project to revision zoning codes including a Unified Downtown Development Code.

You state:

NEED

The Los Angeles River was once a 51-mile-long backbone of a vast system of riparian foothill, riverine,

and freshwater marsh habitat that carried seasonal rains and subterranean flows to the coastal plain and the Pacific Ocean . Over time, the River has been degraded by a cycle of increasing urban development, flooding, and channelization, culminating in the mid-20th Century with the Federal flood risk management project, the Los Angeles County Drainage Area (LACDA) project. The LACDA project encased the river in concrete banks and a mostly concrete bed, and straightened the river's course, thereby diminishing its plant and wildlife diversity and quality, and disconnecting it from its floodplain and significant ecological zones. The entire river corridor is degraded due to historic activities. Apart from the Sepulveda Basin , the San Fernando Valley area of the River (upstream of the study area) is characterized by large segments of channel that are entirely concrete with very few opportunities for adjacent land acquisition. The lower reach of the river is highly constrained by development, including downtown Los Angeles and a heavy industrial corridor that also includes a major transmission corridor and a freeway system. The upper and lower reaches of the river have less potential to connect nationally and regionally significant ecological zones because of the state of existing development. These considerations make the potential for habitat connectivity and expansion very difficult in the near term.

#### Comments:

Not considered in this document are several plans in and around the Study Area.

1. METRO Union Station Master Plan
2. LA-RIO Los Angeles River Improvement Overlay Supplemental Use District
3. LAC+ USC Medical Center Master Plan
4. Los Angeles Convention and Event Center Expansion
5. Farmer's Field (NFL Football) at the LA Convention Center

5

#### Projects proposed are:

1. BOE Bending the River Back into the City (An Art Installation)
2. LADWP Elysian Park-Downtown Water Recycling Projects
3. NELA Riverfront Collaborative

. LA-RIO states the following:

#### BACKGROUND

Los Angeles experienced rapid growth in the 20th century, which ultimately left most of Los Angeles covered with impermeable surfaces. The resulting lack of significant on-site water infiltration has caused the diversion of large amounts of polluted urban stormwater runoff into the channels, resulting in polluted water draining directly into the Pacific Ocean . Consequently, the amount of groundwater available in our aquifers is diminishing due to restricted infiltration.

Furthermore, as Los Angeles ' population increased, the unpredictable patterns of rain and flooding contributed toward loss of human life and property. In an effort to protect existing development and ensure public safety and the safety of future development, most rivers were channelized with concrete.

These channelized rivers function today primarily as part of the stormwater drainage system. In addition to the Los Angeles River, the City storm drainage system consists of numerous channelized tributaries, rivers, streets (including gutters), approximately 1,500 miles of storm drains beneath the streets, approximately 50,000 catch basins that collect runoff from the streets, several large spreading grounds, and several pumping facilities. During dry weather the combined County and City storm drainage systems carry tens of millions of gallons of runoff (e.g., treated waste water, lawn irrigation, etc.) daily. During storms it carries billions of gallons of storm runoff per day via open flood control channels directly to the ocean or to collection systems.

These river channels have largely become neglected, inaccessible urban landscapes that have attracted a high concentration of blighted land uses. Over the past two decades, the City and other organizations have recognized the loss of recreational, environmental and financial value resulting from these



channelized waterways and have engaged in efforts to address the public safety issue in ways that simultaneously revitalize the City's rivers, streams and creeks.

## RIO DISTRICT

The purpose of a RIO District is to assure that development within river adjacent areas is in accordance with design policies adopted in the City's General Plan Framework while also contributing to the overall environmental and ecological health of the City's watersheds. Increased attention to the way development affects the watershed is critical to the sustainability of Los Angeles . With these objectives in mind, staff has developed a set of basic development regulations that all projects within any future RIO will have to abide by.

These standards will facilitate the provision of native habitat, support local species, facilitate the removal of invasive plants, establish a positive interface between river adjacent property and the river, provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area, increase access to the river, and provide exterior lighting that contributes to a safe and inviting atmosphere without casting light into the night sky, adjacent properties, or sensitive habitat areas.

## PLANNED DEVELOPMENT:

CORNFIELD-ARROYO SPECIFIC PLAN CASP Water Supply Assessment approved by the LADWP Board of Commissioners has allowance for:

- \* Residential Dwelling Units-6,960 units
- \* Retail and Restaurant Space-505,611 square feet
- \* Commercial Space-1,891,439 square feet
- \* Industrial Space-6,534,661 square feet

City Planning anticipates:

- \* Surface Parking: 769,877 square feet
- \* Landscaping Area: 2,067,333 square feet

CASP has allowance for TFAR Transfer Floor Area Ratio with payments to the Cornfield Arroyo Seen Specific Plan Floor Area Payment Trust Fund, a public benefit trust fund. Community Benefits qualified for TFAR are:

1. Open Space
2. Community Facility
3. Passageway

City of Los Angeles has changed booking policy for the LOS ANGELES CONVENTION CENTER to focus on citywide events and increased hotel bookings. The inventory of hotels in the area cannot accommodate the policy without an increase in hotel inventory.

Remaining from the previous LOS ANGELES CONVENTION CENTER EXPANSION is Transfer Floor Area Ratio, as a Public Benefit.

Please consider the increase of density, building height, traffic and population with the increase of development on and around Downtown Los Angeles and the Cornfield Arroyo Specific Plan and the Sporting Events of the area.

6

The Native Americans of the area are not recognized Federal tribes and have no claims on the land. There have been State legislative attempts for recognition. Please consider the river area as a staging

7

area for future gaming casinos in this study and the effects on the restoration,

BENDING THE RIVER BACK INTO THE CITY is described as follows:

#### Project Description:

The proposed project would involve construction and operation of a water wheel, loosely modeled after the historic wheel that existed near the project location and would include excavation of a 1,300-cubic-yard pit and maintenance area for installation of the water wheel. It would also include construction of a side channel to the LA River, connecting the LA River to the water wheel pit and installation of an inflatable dam within the LA River channel, creating a water impoundment area upstream of the proposed inflatable dam. The purpose of the proposed project is to physically divert water from the LA River and create an aesthetic/educational statement, showing that the LA River can be used as a source of water. Additional purposes include enhancing connections between the surrounding community and the LA River; and providing a viable long-term non-potable irrigation water source for the State Park and other local demands

This is a private art installation planned by Metabolic Studio (Annenberg Foundation) on Public Facilities property without consideration of flood control or the Clean Water Act and its permitting.

#### ANALYSIS OF YOUR STUDY

Your study:

Alternatives 10, 13, 16 and 20 are compared for restoration and economic impacts under:

- \* National Ecosystem Restoration NER
- \* Regional Economic Development RED

Redevelopment Long-term Economic Activity Cumulative Impacts produces jobs consistent through Alternatives 10, 13 and 16 at 625, 678, 678 respectfully and Local Taxes at \$5.383 million, \$5.789 million and \$5.789 million respectfully.

Alternative 20 produces 2,671 jobs and Local Taxes of \$22,896 million.

Net Gains from AAHU Average Annual Habitat Units at a Unit Price per Investment Cost is:

1. Alternative 10 ART: \$70,663
2. Alternative 13 ACE: \$77,262
3. Alternative 16 AND: \$126,594
4. Alternative 20 RIVER: \$162,194

Estimated Real Estate Investment Cost is:

5. Alternative 10 ART: \$312,000,000 (83%)
6. Alternative 13 ACE: \$315,000,000 (69%)
7. Alternative 16 AND: \$387,000,000 (47%)
8. Alternative 20 RIVER: \$506,000,000 (46%)

Estimated Cash Cost is:

9. Alternative 10 ART: \$64,000,000 (17%)
10. Alternative 13 ACE: \$141,000,000 (31%)
11. Alternative 16 AND: \$437,000,000 (53%)
12. Alternative 20 RIVER: \$594,000,000 (54%)

Planning Objectives are:

- Restore Valley Foothill Riparian Strand and Freshwater Marsh Habitat
- Increase Habitat Connectivity
- Increase Passive Recreation

Missing is the application of existing habitat in Repetto Hills and Ascot Hills.

HAZARD PARK WETLANDS RESTORATION is not addressed in this Report. Any project that would contribute to the HAZARD PARK WETLANDS RESTORATION in United States and State of California ex rel. California Regional Water Quality Control Board, Los Angeles Region v. City of Los Angeles, D.J. Ref. No. 90-5-1-1-809/1 was eliminated.

Habitat Restoration should embrace habitat as known by the wildlife, not by the humans. The flow of a natural state should not be limited if true restoration is anticipated.

LAC+USC MEDICAL CENTER MASTER PLAN use HAZARD PARK for campus purposes.

SIGNIFICANT ECOLOGICAL AREA SEA designation is applicable to ecosystem restoration. Without this designation, we anticipate that the study area will be used as a front for development which would interfere with aspects of habitat restoration.

The City of Los Angeles has grown in density and the region is the densest in the country with 6,999.3 persons per square mile (US Census Bureau). We cannot see that Construction Jobs are the answer for long-term sustainable Economic Development for the area.

#### SOIL CONTAMINATION:

You state:

For the groundwater contamination that cannot be addressed prior to construction, the City will undertake necessary dewatering activities including treatment and disposal, at 100 percent non-project cost in areas with contaminated groundwater.

The City of Los Angeles is aware of these requirements, and has accepted responsibility for delivering lands suitable for ecosystem restoration and addressing groundwater contamination during dewatering.

Although excluded from cost shared project costs, effort and costs of HTRW response and remediation have been considered in evaluating and comparing plans for implementation.

The City understands its responsibility to ensure completion of remediation efforts on affected parcels and provide sites cleaned to the standard required to support the restoration project prior to project construction being undertaken on those sites, and its responsibility for addressing contaminated groundwater during dewatering, including treatment and disposal.

#### Comments:

These hidden costs need to be address upfront. The estimated cost for industrial remediation for the Taylor Yard G-2 Parcel is estimated at \$30-\$45 million.

We need to know firm estimations for soil contamination costs for all Alternatives. Soil contamination is a continuous problem in projects that are rarely identified in the environmental planning stage.

This project could balloon upwards to \$3-\$5 billion. City of Los Angeles has not identified funds to finance such an undertaking.

City of Los Angeles recognizes failed streets, needed water and power infrastructure, Convention and Event Center upgrades, streetcars and other infrastructure necessities. We need to see the project capital costs and anticipated revenue to pay for the capital costs. LA Fire Department has substandard response times.

Debt service will balloon without consideration of cash flow for day-to-day City Operations including Operations and Maintenance of existing Capital Assets.

#### ALTERNATIVES

There is not sufficient information to determine if there will be economic benefit to the communities surrounding the Project. NELA RIVERFRONT COLLABORATIVE has not encompassed existing projects whose efforts are to revitalize the area economically. Simple outreach is not sufficient as the area is facing gentrification because of the increased desirability due to the Project.

11

ALTERNATIVE 13 ACE makes sense matching benefit to outlay.

ALTERNATIVE 20 RIVER is the overwhelming public's choice but is an extreme undertaking economically and logistically

12

Both Alternatives have with no safeguards that restoration would endure with surrounding future development and density. Disease issues have not been addressed. The City would remain a concrete jungle amongst a small strip of water.

13

The cities and regional governance entities downstream were not consulted on the effects of this study.

14

We implore you to protect the PUBLIC HEALTH AND SAFETY. The public expects to put their toes in the LA River.

15

When the river rages during storm events or when fires produce toxic runoff, we rely on protections of those government agencies tasked to prevent disasters and disease.

16

Do Flood Control first.

1

All funding from all entities need to be identified NOW. Bankruptcy should not be an issue for the residents and taxpayers of the City of Los Angeles .

17

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

#### Attachments:

- 1-Open Space Element
- 2-Conservation Element
- 3-Service Systems Element-Public Recreation Plan
- 4-Ordinance 171353
- 5-Richard MacNaughton Esq Letter (Housing Element)
- 6-Community Plans Adoption Status accessed 11.18.2013
- 7-2010 Urban Area Facts (US Census Bureau)

Attachments are on file  
at USACE, LA District.  
Available upon request.

**From:** [Raquel Maria Dillon](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 is better for LA.  
**Date:** Monday, November 18, 2013 9:31:12 AM

---

To Whom It May Concern:

Please count me and my family in favor of the more comprehensive restoration plan for the Los Angeles River.

I bike, walk and picnic along the banks of the river with my friends and family. We live just a couple miles away. The area has so much potential. Please give the river the chance it deserves to serve the people of Los Angeles. This is money well-spent to provide recreational opportunities in an underserved area.

Thank you for your consideration.

Sincerely,

Raquel Maria Dillon

1575 Hazelwood Ave.  
LA, CA 90041

**From:** [Stephanie Din](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Monday, November 18, 2013 2:01:37 PM

---

To whom it may concern,

I would appreciate it if you select Alternative 20 for the Los Angeles River Restoration Program. Me being a student under the Advanced Placement program of Environmental Science from John Marshall High School would highly appreciate it for the sake of our community.

Sincerely,  
Stephanie D.

Sent from my iPhone



**From:** [T.Dragert](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, October 28, 2013 4:24:12 PM

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The prospect of a restored river is very exciting, especially when one envisions the possibilities of walkways, bike paths, wildlife, on and on. Add to that the stunning existing bridges, which would actually serve the normal purpose of a bridge (let's hope we keep those in good repair!), and downtown Los Angeles would offer one of the most beautiful and exciting destinations in the country!

It worries me that a "cost-saving" measure is being considered (Alt 13). While it is understandable that improvements that cost half of what the more desirable alternative (Alt 20) would cost, this once in a lifetime opportunity should not be disregarded because of a penny-pinching mentality. The investment will pay for itself many times over, in so many different ways, that it is disturbing to even consider the "cheaper" alternative.

Please listen to the people of the city, and choose Alternative 20!

Tobi Dragert  
800 W. 1st St.  
Los Angeles  
213-304-5206

**From:** [David Egeler](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] King Middle School Supports Alternative 20  
**Date:** Sunday, November 17, 2013 2:54:57 PM

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Dear Dr. Axt:

My name is David Egeler. I hold a masters in education, and I am the garden coordinator and Resource teacher at T. S. King Middle School in the Siverlake area. I've been using the Los Angeles River as field trip site to learn about habitat and biomes, and issues related to trash and civic responsibility. Each year, for the past nine years, my students have been involved with a community service learning project connected to environmental solutions for the local community, and our local Los Angeles River watershed. Many other teachers at my school site have been doing the same. We are educators dedicated to creating a better balance of our environment and urban community, and we want to teach those values to our students.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. Cities

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)

- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us, and our City! The project is worth the additional costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

**David Egeler**  
*Resource Specialist*  
*Sp Ed Dept. Chair*  
*Garden Coordinator*  
**Environmental Studies Magnet**  
T. S. King Middle School  
Los Angeles Unified School District  
4201 Fountain Ave.  
Los Angeles, CA 90029  
Off. 323.644.0067  
Fax 323.913.3594

"Education is the most powerful weapon you can use to change the world."

- Nelson Mandela

**From:** [Scott Epstein](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please support Alternative 20  
**Date:** Monday, November 18, 2013 1:25:45 PM

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Dear Dr. Axt:

I am writing to strongly encourage the Army Corps of Engineers to endorse Alternative 20 of the ARBOR study.

I deeply appreciate the hard work that the Army Corps has put into the ARBOR study, and evaluating different alternatives. However, I believe the study does not capture all of the important benefits from revitalizing the LA River. Alternatives other than #20 fall short in terms of offering Angelenos access to the river for recreation and transportation. Benefits from access to the river include improved public health, reduced carbon emissions from car trips, increased investment in river-adjacent neighborhoods, and increased economic activity due to both residents and tourists taking advantage of new recreational activities. These important benefits are not adequately weighed in the ARBOR study.

The LA River can be the Emerald Necklace that LA so desperately needs. Please support Alternative 20!

Sincerely,

Scott Epstein  
Los Angeles resident

**From:** [erasmorocio01](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Monday, November 18, 2013 2:01:28 PM

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----- Original message -----

From: erasmorocio01 <erasmorocio01@gmail.com>  
Date: 11/18/2013 1:59 PM (GMT-08:00)  
To: comments.lariverstudy@usace.army.mil  
Subject:

To whom it may concern I would appreciate if you select Alternative 20 for the Los Angeles river restoration program. Me being a student of an Advanced Placement Enviornmental Science class would highly appreciate it for the sake of our surrounding community.

Sincerly , Rocio Erasmo john marshall high school.

Sent via the Samsung Galaxy S™III, an AT&T 4G LTE smartphone

**From:** [Chantelly Ferrufino](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Monday, November 18, 2013 2:01:27 PM

---

To who it may concern,

Please reconsider your decision. Please choose Alternative 20.

Thank You  
Chantelly Ferrufino



**From:** [Corey Field](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River support for alternative 20.  
**Date:** Thursday, October 17, 2013 7:19:55 AM

---

Please spend the extra money on alternative 20 to better restore the LA river.

Thank you,

Corey Field

Studio City

Sent from my iPad

**From:** [Jocelyne Fine](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] LA River Restoration - Public Comment  
**Date:** Sunday, November 17, 2013 8:19:19 PM

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Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms Erin Jones, CESPL-PD-RN  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

We have lived in Los Angeles for thirty-seven years, the last fourteen in the San Fernando Valley, so the upcoming selection by the Corps of a plan to restore the Los Angeles River is extremely important to us. We believe the best plan is "Alternative 20" covered in your LA River Ecosystem Restoration Report, which we have viewed at your website (<http://www.spl.usace.army.mil>).

The consequences of this decision will be with us for years. Alternative 20 should be embraced as the best option to achieve the desired balance between our environment and urban community. That is why I agree with FoLAR, Mayor Garcetti, Senator Boxer and so many other people throughout the region who urge you to adopt it.

Alternative 20 is the most comprehensive and sustainable. Selecting any other plan may very well lead to decades of unresolved issues requiring additional funding to mitigate. In the aggregate over the long term those costs could easily dwarf the hefty price tag of Alternative 20. Do it now, save billions later.

Please do not miss this opportunity to restore the river in a way Los Angeles can be proud of. Doing it right will restore your reputation as well.

Thanks for your attention.

Sincerely,

Jocelyne and Steve Fine  
5715 Beck Avenue  
North Hollywood, CA 91601  
[jocsto@yahoo.com](mailto:jocsto@yahoo.com)

**From:** [Chris Ford](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. River Study, I support Alternative 20  
**Date:** Wednesday, November 20, 2013 8:02:32 AM

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I enthusiastically support Alternative 20 for the LA River.

Thank you.

November 18, 2013  
Josephine R. Axt, Ph.D., Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN; Los Angeles, CA 90053-2325

Forster

Subject: Alternative 20 -- Los Angeles River Ecosystem Restoration

Dear Dr. Axt:

My name is Peggy Forster. I live in Studio City near the Little Tujunga Wash, a small tributary where recently improved pathways invite public walks along side the steep concrete walls of the Los Angeles River. Surprisingly, within this uncommonly dry and densely populated urban corridor, nature perseveres and continues to delight us with a small slice of blue sky, here -- a few green trees and woody thickets, there -- and the flutter of wildlife amidst the humming of traffic -- all providing a hint of the natural world yet to be revealed by the Los Angeles River Ecosystem Restoration. We are thrilled by the thought of open sky, expansive greenery, natural shorelines, and the restored ecosystems -- re-connected once again as the concrete slowly disappears and a thriving River unites our communities.

Knowing this dream of a revitalized river will soon become a reality, I want to thank the Corps, and all others who have worked so hard for this long-awaited urban transformation.

While Alternative 13 has been identified as the Corps' Tentatively Selected Plan, for a number of reasons, I am supporting Alternative 20, and am asking the Corps to reconsider their choice, believing that Alternative 20 is the most transformative and significant option -- insightful and future-oriented in this age of global warming and increasing urban growth.

Having recently studied the science of climate change, and acquired a certificate in Global Sustainability, I have become acutely aware of the close relationship between many human and industrial activities and the heat-island effect of urbanization. Prior to the Industrial Revolution, large quantities of carbon dioxide, a significant "greenhouse gas," were naturally sequestered within Earth's numerous carbon sinks -- the oceans, lakes, rivers, soil, and vegetation.

As small towns throughout the world transitioned into large metropolitan centers, millions of acres of trees and soil were removed and replaced by concrete and asphalt, barring absorption of carbon by Earth's natural sequestering systems; and initiating more than a century of atmospheric pollution and climate change. Only in recent decades have nations and cities sponsored reforestation and tree-planting campaigns in order to reinstate the function of Earth's natural carbon sinks..

The importance of these efforts can be found in The Kyoto Protocol which indicates that natural sequestering of carbon within the roots and leaves of trees, and within the soil as well, is as effective in reducing "greenhouse gas" emissions, as are reductions in the use of fossil fuels. Breaking through concrete and removing asphalt -- wherever and whenever possible -- re-enables carbon sequestration and helps to stabilize global temperatures and cool the planet.

A new awareness of glacial melt and rising seas also suggests that time is short, and we can no longer postpone our responsibilities or transfer massive debts to future generations. Reparation is required now, and mitigation must begin on a very large scale if we are to avoid the cascading effects of climate change.

Within the next few decades, Alternative 20 will result in untold benefits and advantages, not only hastening the renewal of local natural resources, but providing a national model for reducing the carbon footprint of one of the world's largest cities. I believe Alternative 20 is a brilliant and timely plan for the restoration of ecosystems and a reduction in global warming. A future, which must include urban farming to insure food security, must also depend upon an accessible Los Angeles River. Alternative 20 is a plan which embraces this potential for reshaping Los Angeles, insuring food security and the safety and health of future generations.

Thank you for your consideration.

Sincerely,

Peggy Forster  
Founder and Director  
The Environmental Relief Center  
peggy.forster@prodigy.net

**From:** [Jason Fourier](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 for L.A. River  
**Date:** Thursday, October 17, 2013 1:49:31 AM

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Greetings,

I'm a resident of Toluca Lake, California, and I'm writing to urge you to select Alternative 20 for the revitalization of the Los Angeles River. Over the last few years, I've experienced the L.A. River opening up to the public bit by bit with programs such as river kayaking trips, and I was amazed to discover this oasis of natural beauty right in the middle of our sprawling urban metropolis. At some points in our kayaking trips, I couldn't tell our river apart from the middle of the wilderness! Some L.A. residents carry a perception of the River as empty or filled with pollution, but I've experienced firsthand that this is not the case, nor should it be. City residents need a way to reconnect with nature more than ever, and Alternative 20 would help make this possible. The L.A. River should be there for everyone to enjoy, not forgotten and neglected. Please select Alternative 20.

Thank you,  
Jason Fourier

--

Jason Fourier  
[fourier@acm.org](mailto:fourier@acm.org)

**From:** [Veronica Franco](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Tuesday, October 15, 2013 5:38:15 PM

---

HI,

I will be attending the public meeting on Thursday and would like to have Alternative 20 discussed as part of the plans that are up for discussion.

Thank you.  
Veronica.



**From:** [LF](#)  
**To:** [SPL Comments LA River Study](#); [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org)  
**Subject:** [EXTERNAL] Owens Valley residents in strong support of Alternative 20  
**Date:** Monday, November 18, 2013 12:35:24 PM

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As a resident of the Owens Valley, the source of a considerable share of Los Angeles' water supply, I'd like to lend my support for the fullest restoration of the Los Angeles River possible.

The City of Los Angeles is participating in a major river restoration program up here with the Lower Owens River (which feeds the Los Angeles Aqueduct), we need your help to do the same for Los Angeles' river. It can, and should be done.

Sincerely,

Lawrence Freilich

135 S Jackson St

Independence, CA 93526

**From:** [Justin Frimmer](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Saturday, November 16, 2013 11:37:37 PM

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Given the options, I give my support to Alternative 20, or RIVER (Riparian Integration via Varied Ecological Introduction). ☐

The better options would be to tear out all of the concrete walls and have a true river that flows all the way to the Pacific Ocean. ☐

Not sure why we are sending these emails to the U.S. Military? I assume federal dollars will pay for the final decision? ☐

If not, I hope the people of L.A. rip out those concrete walls, build serious river bank beauty, find more eco-water, make it navigable by real boats and turn it into a centerpiece of the city that will make the Seine in Paris look like an afternoon trickle. ☐

November 18, 2013

Josephine R. Axt, PhD., Chief Planning Division  
U.S. Army Corps of Engineers, Los Angeles District,  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, California 90053-2325  
[comments.1ariverstudy@usace.army.mil](mailto:comments.1ariverstudy@usace.army.mil)

SUBJECT: **Los Angeles River Ecosystem Restoration Study**

Dear Dr. Axt,

I have a Master's Degree in City and Regional Planning and 25 years of professional experience. A comprehensive evaluation of the entire watershed should be considered when proposing ecosystem restoration for the Los Angeles River. Reviewing alternatives for less than a quarter of the approximately 50 mile river and not considering the hydrology of the watershed is a piece meal approach to environmental review and the planning process. Although my preferred option is the total restoration of the entire LA River, I support the adoption and implementation of Alternative 20.

The reasons given in the Study for not considering full restoration are summarized as follows:

1. Require Adoption of Best Management Practices for entire watershed
2. Increase permeability
3. Substantially reduce peak flows
4. Floodplain buy back program

The factors identified as reasons for not considering total restoration are the very issues that need to be addressed to ensure successful river restoration efforts. It is very important to consider the River's ecology within the larger hydrologic context. I concur with the conclusions of the Integrated Resources Plan (Adopted 2006) that considers water supply, waste water, and storm water as interdependent systems.

I believe water quality and the reduction of peak flows are the two most critical issues impacting the Los Angeles River. Water containing bacteria, heavy metals, pesticides and a wide variety of other pollutants should not be entering a river ecosystem. Water velocity above 12 feet per second makes maintaining plant material within the river channel very difficult. Reducing peak flows will help to ensure stable riparian vegetation and provide a measure of flood protection. These concerns can only be addressed at the watershed level.

To address water quality and quantity issues I have developed a concept known as Blue Boulevards. My approach is a comprehensive system for collecting, treating, and storing storm water. The main component of my proposal is the placement of underground cisterns within existing road rights-of-way to capture storm water.

Based on the estimated 10 billion gallons of water per day during rain events identified in the study, I calculated the size and number of cisterns required to capture the maximum amount of urban runoff. My assumptions are as follows:

- The cisterns would be approximately the width of two travel lanes (30 feet).
- A 15 x 30 x 100 foot cistern holds 336,623 gallons of water.
- Three cisterns can be accommodated under the roadway in an average 300 foot block (holding over 1 million gallons of water).
- It would take approximately 1,000 miles of roadway to accommodate 10 billion gallons of water if ten blocks (3,000 feet) of each mile contained the specified cisterns.

Accommodating the required cisterns should not be problematic in an area containing hundreds of thousands of miles of roadway. I recommend first evaluating the streets adjacent to the existing storm water system for potential conversion to Blue Boulevards.

In my Blue Boulevard concept the cisterns are only part of a larger system designed to collect, treat, and store storm water before it is strategically released into the river ecosystem. The underground cistern (or combinations of cisterns) fill one third of the width of an average roadway. The other two thirds of the street contain urban orchards and holding tanks for “clean” treated water. If an agricultural strip 30 feet wide was incorporated into every block containing a cistern I estimate three acres of irrigated farmland would be created for every mile of roadway converted to a Blue Boulevard. The agricultural component will significantly increase water infiltration throughout the study area by introducing 3,000 acres of well-drained soils and eliminating impervious road surface. Ideally, the onsite urban farmers could manage the maintenance and operation of these block size storm water reclamation systems as part of their lease agreements.

I suggest the Army Corps and the City of Los Angeles consider a comprehensive approach to managing water quality and quantity as part of the river ecosystem restoration effort. Please evaluate my Blue Boulevard concept and consider the hydrology of the entire watershed when considering future alternatives.

Sincerely,

Lauren Lajoie Frye

865 Toro Street  
San Luis Obispo, California, 93401  
(805) 459-7240  
[Lajoie.lauren@gmail.com](mailto:Lajoie.lauren@gmail.com)

Cc: Friends of the LA River (FOLAR)

**From:** [Charles Funaro](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] ARBOR = In support of Alternative 20 for the Los Angeles River  
**Date:** Monday, November 18, 2013 7:58:59 AM

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During the summer of 2013, I had the good fortune of kayaking down the Los Angeles River with LA River Expeditions, led by George Wolfe. It was my first outing in a kayak, and it was a wonderful introduction to the beauty of our river.

Although Alternative 20 is the most expensive alternative, it also delivers the most "bang for the buck" by enlarging our urban oasis. The city needs more recreational areas to serve the constantly-growing population, and maximizing the remediation of our river affords the best opportunity to meet that need.

Opting for a less-expensive alternative will only delay implementation of necessary changes, and increase expense, as costs of remediation invariably creep upward. Also, the sooner we can address the issue, the sooner our river will be healed, and our community blessed.

Thank you for considering my comments.

Charles Funaro

--

Charles W. Funaro II  
Attorney at Law  
221 E Walnut St #255  
Pasadena, CA 91101-1554

(626) 578-0440 office  
(626) 578-0923 fax

CharlesFunaro@Hotmail.com

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This email is free from viruses and malware because avast! Antivirus protection is active.  
<http://www.avast.com>

**From:** [Ruth Gallardo](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Endorsement for Alternative 20  
**Date:** Saturday, November 16, 2013 1:20:20 AM

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Dear Dr. Axt:

My name is Ruth Gallardo, I am an Architectural and Landscape designer in Hollywood and now reside and work in the Elysian Valley. I often hike and bike along the river to get away from the bustle of this metropolis. I also see the locals, visitors, and tourists come to enjoy the river. The Los Angeles is River is our little jewel right here in the city. We no longer have to travel to the ocean or mountains to enjoy nature, its right here in our midst! and it can even be greater by connecting more communities and creating more habitat to the river. Alternative 20 is the most comprehensive plan that will connect the mountains to these urban river corridors, further enhancing biodiversity for an eco-rich habitat for wildlife. The river corridor to the mountains provide crucial connections for animals in the eco-system. The connectivity of the Verdugo Wash to the mountains is a critical component of any ecosystem plan and must be included in the Federal project. With the emergence of these cumulative natural resources, other major benefits would be cleaner air and water that are key to health of the habitat, people, and the planet.

Let's choose the plan that is essential for long term sustainability, that will transform our degraded urban watershed into a riparian rich habitat that it can be once again!  
Thank you,  
Ruth Gallardo



Todd Garlington  
2675 Rich Street  
Los Angeles, CA 90039

November 7, 2013

Josephine R Axt, PhD, Chief, Planning Division  
US Army Corps of Engineers, Los Angeles District  
PO Box 532711  
Los Angeles, CA 90053

ATTN: Ms. Erin Jones, CESPL-PD-RN

Dear Ms. Jones,

I am writing to you in regards to the Los Angeles River Ecosystem Restoration Feasibility Study, in particular, Reach 6 / The Taylor Yard.

The study identifies the Taylor Yard as a key area "because it provides an opportunity for restoration of large contiguous expanses of riparian and aquatic habitat." As an Elysian Valley homeowner and Los Angeles native, I urge the US Army Corps of Engineers to realize the full potential of this opportunity by selecting Alternative 20 as the means to achieve this vision.

Clearly, the revitalization of downtown Los Angeles and adjacent communities has brought about significant change to the area. The culture of the region recognizes and supports what can broadly be described as a Green ideology. Alternative 20 not only impacts the ecology of the Los Angeles River but goes further to promote the health of Angelenos and improve their quality of life overall.

The time has come for the people of Los Angeles to learn from prior mistakes in urban planning. When I was a boy, my grandfather would tell me of the streetcars that once ran along Exposition Boulevard from Downtown to Santa Monica. Generations later, Metro construction inches along at an astronomical cost. If only the railways had been preserved. If only a long term approach based on vision and balance had been implemented.

Management of the Los Angeles River tells a similar story. Let us not only rectify past decisions that have resulted in a highly-degraded watershed, but put in place a robust plan, namely, Alternative 20 to restore habitat and provide more green spaces for people to enjoy for generations to come.

Best Regards,

  
Todd Garlington

**From:** [Elizabeth Garrison](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] la River  
**Date:** Monday, November 18, 2013 4:32:36 PM

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Do as much as you can to bring the river back to a more natural state. Also work with the cities this river passes through so there is a more cohesive existence between them. Let recreation take place that doesn't require any additional concrete. Pocket parks!!! yay! Make it possible for the sand to make it's way back to the sea, rather than selling it all to Vulcan.

From: Someone [<mailto:louderr3@gmail.com>]

Sent: Friday, October 25, 2013 4:09 PM

To: SPL Comments LA River Study; Axt, Josephine R SPL; Colloton, Kimberly M COL SPL

Cc: carol.armstrong@lacity.org; patti.berman@dlanc.com; dlanc.jr2brown@gmail.com;

dianadelpozomora@yahoo.com; edward@casa0101.org; jay@empowerla.org; kflores@folar.org

Subject: TIME SENSITIVE request

Ms. Axt and All Parties,

I'm the blue-haired community volunteer who spoke as chairman of the DLANC-BHNC Joint River Oversight Committee at your Oct 17 Public Hearing and collected your emails directly afterward. The Joint River Oversight Committee is an effort by two adjacent neighborhood councils to gather stakeholder opinion and supervise all activities straddling the bridges and riverfront areas of most of downtown LA and Boyle Heights. Therefore it's a huge responsibility and unique opportunity at the same time. We just started the Committee earlier this year so I am rushing to catch up with you all.

I have planned a public comment meeting at 7 pm on Monday Oct 28 at the Vortex Community Center, 2341 E Olympic Bl LA CA 90021 and you are all invited. In fact, I need help promoting it. But that's not the purpose of my letter. To be on the safe side, I am going to take OFF my Neighborhood Council Director hat right now and speak to you as a private citizen. Also, I am cc'ing our parliamentarian Jay to make sure I don't cross any ethics boundaries :)

Ms Axt, here is my concern as a regular citizen: As a private community volunteer who has seen the work cycle of many Neighborhood Council meetings, the public comment period you have provided isn't tenable. The public is at a huge disadvantage, scientifically and logistically. My father was a rocket scientist, I grew up surrounded by scientists and have been well aware of ACE and its illustrious history since age 5. It's well-known you are a top-flight organization and have the best of everything. What is easy for you is not so easy for mom and pop. You have the whole govt and its resources on tap. You may not even realize what you are asking of the public :)

I've partly reviewed the Draft IFR PDF report you sent Patti Berman (DLANC President). She asked me for the 'reader's digest' version. Well...This is a 500 page book. And 11 Appendices!

I'm a serious cat and I wanna do my diligence on behalf of the community but that isn't possible under the circumstances. In section 8-1 of the Draft IFR, you list a 45-day public review period. Yes, that corresponds to the postmark on Patti Berman's package. However, the Neighborhood Council is staffed with volunteers who work in the daytimes and further, they are required by law to follow procedures to assure that the stakeholder opinions they collect are representative of the public at large. That means that if we are to respond correctly as citizens, using the Neighborhood Council system, we have to go through the established channels which have their own pre-existing time frames. Realistically, a safe turnaround time is 3 months.

The Neighborhood Councils are definitely your best source of 'one-stop shopping' for informed stakeholder opinions. They can educate stakeholders and collect responses, that's what they were designed for. But they are somewhat slow as are all govt agencies, even more so because they are part-time, unskilled volunteers. You need to give them a chance to do their job--you have had a great deal of time and the world's most cracker-jack tech crew to prepare your presentation :)

In reviewing the Draft IFR, I'm a bit saddened to see the excellence of your efforts go unrecognized. I mean it--I can see that 20 different proposals were painstakingly merged and reorganized to result in the 4 active proposals. They are AWESOME, every one of them. But where are the companion magazine articles and news stories to inform the public? Where's the rallying and flag-waving? This is an historic project and yet-- I see mostly media silence and an under-informed public. This is not what you want. I can see why the project has turned into a vague question of (ACE recommended) Alt 13 vs. (Mayor-supported) Alt 20. The public has had limited education or involvement. I think it's a waste of your cost-benefit efforts (yes I analyzed that section) to have all of LA blindly clamoring for the 'biggest' option unless we can provide scientific and social opinions somewhat on a par with what you have provided us &

give you good cause to take our feedback seriously. And what about the 'in-between' proposals? You put a lot of effort into offering us a reasonable set of options, give us time to look at them and understand your logic.

AS AN EXAMPLE of an informed stakeholder opinion: My Joint River Oversight Committee represents both sides of the Downtown LA area, a large geographic area. One of the proposals, Alt 20, brings the River Project to 'northern' Downtown LA. That's very exciting. But I also serve as DLANC Board representative to the Alameda East District (SOUTHERN downtown LA, a largely undeveloped area). I can see the future clearly. IF the River Project comes to 'northern' Downtown LA, it will trigger tourism, intense media-industry activity, and development in all adjacent areas. That's awesome but adjoining areas not under USACE or City Of LA control will immediately be grabbed by big developers for obvious reasons. That could cause reckless development in south Downtown LA. Therefore, the area I serve may be more vulnerable to 'collateral' exploitation than any other part of urban LA.

I have worked long and hard to create a committee that can forestall that and other problems. This issue may be outside the scope of your study & may not something you are able to consider. But I am presenting it as an example of what sufficient forethought from the public could accomplish to aid you in your decision making. I've not yet found mention of collateral development and its impact in your book.

To conclude, I had a wonderful time at your meeting on Thurs and it seemed that you ladies were enjoying it too. Please understand that I'm trying to help you fulfill your mandate to collect stakeholder opinions and my comments herein are not on behalf of my two constituent groups because actually I don't have enough time to bring this before my board for a vote and bring you an 'official' DLANC letter! I am barely able to formulate an opinion myself.

Thanks for your time and excellent work. I am delighted at how thorough the Draft IFR study is. For a science geek like me its a fascinating read. Please give me a chance to digest and 'translate' it and show it to a few people before you decide. My suggestion is that you extend the public comment period to Dec 31.

Thanks for your time.

Friends,

Geza Gedeon  
speaking as an individual citizen

**From:** [Jones, Erin L SPL](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** FW: Alternative 20—the most expansive ecosystem restoration  
**Date:** Monday, November 18, 2013 8:47:44 AM

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-----Original Message-----

From: Jennifer A. Gill [<mailto:geneffer@pachell.net>]  
Sent: Sunday, November 17, 2013 1:54 PM  
To: Jones, Erin L SPL  
Subject: [EXTERNAL] Alternative 20—the most expansive ecosystem restoration

Hello Erin:

The completion of the LA River Ecosystem Restoration Feasibility Study is a remarkable moment in the revitalization of the LA River. The Study lays the groundwork to bring millions of dollars in investment to the river and to the City of LA.

I would like to support the City's preferred alternative which is Alternative 20—the most expansive ecosystem restoration possible and it is the only one that specifically includes the following priorities:

Verdugo Wash Confluence and the LA State Historic Park (former Cornfields site). And, I expect that this will help connect the L. A. River Bike Path through the industrial area of downtown Los Angeles. Please, take note that that Alternative 20 is my preference.

Thanking you in anticipation.

Jennifer A. Gill, Board Member D-1  
Los Angeles Bicycle Advisory Committee

213-427-0759 (cell)

**From:** [Helen Giroux](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternate 20  
**Date:** Saturday, October 12, 2013 4:52:49 PM

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I support Alternate 20!

*Helen R. Giroux*  
*Studio City, CA 91604*



**From:** [Patricia Gleason](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Tuesday, November 19, 2013 5:51:36 PM

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Dear Dr. Axt,

My name is Patricia Gleason, and I have been a resident of Los Angeles since 1995

(I have also participated in the annual L.A. River cleanup).

I would like to express my opinion that Alternative 20 is far superior to Alternative 13.

Restoration of the Los Angeles River is very important to a greener future.

We urge the Corps and City to select Alternative 20, as it provides the best restoration and the best sustainability for the future.

Sincerely,

Patricia Gleason

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Patricia Gleason  
6767 W. Sunset Blvd. #117  
Los Angeles, CA 90028  
Phone (323) 828-3153  
Fax (323) 375-3249  
Email: [pm.gleason@verizon.net](mailto:pm.gleason@verizon.net)

**From:** [Horacio Gomez](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River IFR Comment  
**Date:** Sunday, November 17, 2013 10:11:01 PM

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To whom it may concern,

I would like to submit the following comment for consideration with regards to the LA River IFR.

Comment:

The various alternative plans are presented, "...based on incremental increases in costs and benefits" according to the Integrated Feasibility Report. However, the benefits could easily be interpreted as being more than just incremental but exponential. For example, the extensiveness in public accessibility and activity afforded by Alternative 20 creates benefits to the community that fail to be fully acknowledged by the metric of increased nodal habitat connectivity, additional restored acreage, and habitat increases. Furthermore, green spaces that are accessible by a lower-income and minority demographic help rectify the marginalization experienced by these communities as Environmental Justice issues. Many of these benefits may not be immediately quantifiable but are no less significant. Indeed, some of these issues are touched on in the report but there is a clear indication that they fail to be fully included in the assessment of additional benefit. Perhaps it would be prudent to take on these additional considerations with the same weighted validity as the quantitative measures already employed. In doing so, it may be apparent that Alternative 20 yields the best 'bang for the buck' outcome that merges both primary and secondary purposes into a holistic approach. Also, the report noted that the four plans, "...present a reasonable range of alternatives." (xxvi) As such, why not pick the plan with the maximum amount of benefit.

Thank you,

Horacio Gomez

GTZOOM@Gmail.com

**From:** [Gonzalez, Jay](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments LA River Study and Proposals  
**Date:** Monday, November 18, 2013 12:36:04 PM

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Dear Army Corps –

I am writing in support of Alternative 20 as stated in your Feasibility Report – Sept 2013:

“ Alternative 20 is called RIVER (for Riparian Integration via Varied Ecological Reintroduction) as it includes all the elements of Alternatives 10, 13 and 16 and additional features in reaches 2, 3 and 7, including restoration of the Verdugo Wash confluence and the Cornfields site. It includes widening in Reach 2 on the west bank. In reach 3, this alternative restores the confluence with Verdugo Wash by softening the bed of the stream and significantly widening the mouth of the wash thus providing riparian habitat and an additional connection to the San Gabriels through the Verdugo Hills. In Reach 7, daylighted streams also included in Alternative 10 are reintroduced in lieu of channel bank vegetation features that were in Alternatives 13 and 16. Also in reach 7, wetlands are restored at the Los Angeles State Historic Park with a terraced connection to the mainstem. For Alternative 20, there is some degree of channel naturalization and restoration in nearly all reaches, and inclusion of two major confluences (Verdugo Wash restoration bordering the City of Glendale is added, along with a connection between the river and its western bank at the Los Angeles State Historic Park(Cornfields/Chinatown area)).”

[Alternative 20 is the one proposal that most closely adheres to the stated restoration Key Considerations and Policy Issues,](#)

“Purpose: “ ... to restore significant structure, function and dynamic processes that have been degraded.” (EP 1165-2-501)

- Intent: “ ... to partially or fully reestablish the attributes of a naturalistic, functioning, and self-regulating system.” (EP 1165-2-502)
- Scope: “Nationally and regionally significant wetlands, riparian and other floodplain and aquatic systems” (ER 1105-2-100)”

The Los Angeles Unified School District has approximately 120 schools within one mile of the River and having a restoration project that encompasses the greatest amount of watershed accomplishes two things: First, it reestablishes, to a greater degree than alternative proposals, a “functioning, self-regulated system” which is congruent with the basic Science principles our students study and learn about the functioning of ecosystems, Second, it addresses, to a greater degree, restoration and establishment of “ ...wetlands, riparian, and other floodplain and aquatic systems” that all students need to see and interact with in order to become knowledgeable stewards and champions of the world in which they live, and to effect critical change in their living and working habits that will help to ensure the quality of life of all Los Angeles residents into the future.

Since the River runs through LAUSD, and our students have this unparalleled resource to use for hands-on, real-world science projects that can connect them in new ways to their communities, Alternative 20 offers the greatest potential for the LA River to be incorporated into students’ daily learning activities, service learning, and citizen science projects. But more than this, with a fully functioning River, our students can be the data collectors, monitors, and contributors to the health of their River now and for generations to come.

Alternative 20 for all the children of Los Angeles.

Best,

J. Gonzalez

**J. Gonzalez**

Division of Intensive Support and Intervention

Los Angeles Unified School District

333 S. Beaudry Ave, 20th Fl

LA, CA 90017

213-241-1280 ofc

818-645-3736 cell

**From:** [Howard Goodman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. RIVER COMMENT  
**Date:** Thursday, October 17, 2013 11:21:52 AM

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I strongly support "Alternative 20" as the plan which will best serve the public and maximize access to the Los Angeles River in the future.

Thank you,

-Howard Goodman

**From:** [EVegan Gray](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Thursday, October 17, 2013 6:03:17 PM

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As a native born and lifelong Los Angeles resident, I am asking to move the "alternative 20" plan forward.

Thank you  
Evelyn Gray  
16653 Hamlin St  
Lake Balboa, CA 91406



**From:** [Linda Griffin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Funding of LA River  
**Date:** Thursday, October 17, 2013 9:24:35 AM

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I am writing to express my support of funding the master plan for revitalizing the LA River. The River is an eyesore in the middle of our town, and the recent changes that have been made to the River by a community of volunteers has been extraordinary. Cleaning up the River, extending the areas that are still unnavigatable, and the surrounding park areas and bikeways would be a great step toward bridging our neighborhoods and making our community safer for our children.

Thank you.

Linda Griffin

**From:** [Kathleen Haagenson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please chose Alternative 20  
**Date:** Monday, November 18, 2013 10:37:52 PM

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Thank you for working on a report about the restoration of the ecosystem of the Los Angeles River. With such an huge population affected by your report and decisions that will come from this report in the future, it is important to me as a concerned California citizen that this report not be based just on economic reasons, but also other reasons, like social effects and water quality.

After reading the report carefully and listening to educated, informed people on this subject, I believe the report should be recommend selection of Alternative 20.

Thank you very much for your consideration. I look forward to hearing of the final decision, and look forward to a change in the Tentatively Selected Plan to Alternative 20.

Sincerely,

Kathleen Haagenson  
Concerned Citizen of California

Gedeon

**From:** [C. Andrew Hall](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [FoLAR](#)  
**Subject:** [EXTERNAL] support for Alternative 20  
**Date:** Friday, November 15, 2013 8:53:32 PM

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Dear Dr. Axt:

For the reasons that have been well articulated by FoLAR, I am writing to express my support for Alternative 20 rather than Alternative 13.

I have lived in Atwater Village for over 5 years. I have recently married and am putting down roots in this neighborhood. The nearby river is important to me and my family. I use the bike path a few days a week. And my wife heads up a local running school that uses the bike path and tunnel to Griffith Park daily. And in 2011, I even made a film that prominently featured the river. We know the river well, are connected to the it, and want to see it flourish and improve the lives of all Angelenos.

Thank you

C. Andrew Hall  
Atwater Village

Mark Hanna  
760 Loma Drive  
Hermosa Beach, CA 90254

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, CA 90053-2325  
comments.lariverstudy@usace.army.mil

November 17, 2013

Subject: Comments on the Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report

Dear Dr. Josephine R. Axt:

I respectfully submit the below comments to the United States Army Corps of Engineers regarding the September 2013 Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report (Report). As a water resources engineer with education and training in ecology I have an appreciation for the intricacies of habitat restoration, and the multiple metrics that can confound the valuation of habitat. I will focus my comments on how habitat valuation in the Los Angeles River should consider the compounding benefits to habitat from improved water quality, and the positive impacts to habitat in the Colorado, Eastern Sierra, and Bay-Delta watersheds from increased local water supply in Los Angeles.

According to the Report, there is an increase of 131 acres of habitat between Alternatives 13 and 20. Open space acres such as these, adjacent to impaired water bodies, are repeatedly identified as critical pieces that can contribute greatly to the region's water quality solution. And currently the municipalities within Los Angeles County are spending millions of dollars in implementation planning to develop a comprehensive framework to improve water quality in these same regional water bodies. Water quality benefits from land use changes, natural treatment capacity, and in-stream flow management from 131 acres of additional open space can combine to provide significant improvement in the water quality of the Los Angeles River. For example, the Piggyback Yard project under Alternative 20 *can reduce pollutant loading from the site and tributary areas by 50% to 100%* (MRCA's Piggyback Yard Feasibility Study, 2013). And a recent study of stormwater capture in Los Angeles County identified that each acre of land that receives "well sited" retrofits could yield *more than 200 pounds of pollutant reduction annually* (WRD's Stormwater Recharge Feasibility and Pilot Project Development Study, 2012). Incorporate the Treatment Area Ratios (TARs) developed by the Green Solutions methodology, where *each acre of habitat can potentially provide treatment for 6 to 20 acres of upstream tributary drainage* (Green Solutions Project Technical Report, 2008; GLAC-IRWMP OSHARP, 2012), the 131 acre increase between Alternatives 13 and 20 becomes even more significant. These water quality improvements will in turn contribute to enhanced ecological health for all components within Alternative 20, and to the Los Angeles River as a whole.

Mark Hanna  
760 Loma Drive  
Hermosa Beach, CA 90254

In addition to water quality benefits, important water supply benefits will also accrue. The water supply portfolio for the City of Los Angeles consists of 15% local supplies (groundwater, recycled water, conservation) and 85% imported water (Colorado River, Eastern Sierras, and the Bay-Delta). Recent studies by the Arid Lands Institute and the Council for Watershed Health have identified between 90,000 and 180,000 acre feet of stormwater runoff per year in the Los Angeles River watershed that could possibly be captured and beneficially used. This new resource, if developed, can *double or triple the City's local water supply* hence reducing imports by 15 to 30%. Currently another \$3,000,000 is being spent for implementation planning by the City and County of Los Angeles, the United States Bureau of Reclamation, and multiple regional water districts to understand the feasibility of improving stormwater capture for water supply. Between Alternatives 13 and 20, Alternative 20 offers a much greater opportunity for significant increases in the capture and beneficial use of dry-and wet weather flows. Combined with the fact that these additional 131 acres are all *adjacent to major waterways*, and *situated directly above some of Southern California's most productive groundwater aquifers*, namely the San Fernando and Central Basins, there is a direct link between water supply and habitat that this Report should consider. Any and all opportunities to increase local water supply should be taken to reduce Southern California's reliance on the Colorado River, the Eastern Sierras, and the Bay-Delta, which in turn increases successful habitat restoration in these far away watersheds.

Habitat valuation for the Los Angeles River should consider the compounding benefits to habitat from improved water quality, and the positive impacts to habitat in far reaching watersheds from increased local water supply. And with the paucity of wetland and riparian habitat in a densely populated urban environment such as ours, the additional 131 acres that Alternative 20 offers should be compared to a much higher standard.

Thank you,



Mark Hanna, PhD, PE  
wmarkhanna@yahoo.com  
(310) 245-4708

CC: Carol Armstrong, PhD

**From:** [Cindy Hardin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 6:36:29 AM

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Dear Army Corp of Engineers,

Regarding the proposed project to improve habitat and public access of the Los Angeles River, I urge you to choose Alternative 20. This is an incredible opportunity to create something that will be used by wildlife and enjoyed by the residents of our park poor city for generations to come.

I am the Education Coordinator for the Los Angeles Audubon Society. We provide field trips to the Ballona Wetlands and Kenneth Hahn State Recreation Area to over 3,000 schoolchildren annually, with the help of a volunteer staff of 50 people. Last spring I arranged to take our volunteers on their own field trip to the Atwater Extension portion of the River, with lunch afterwards at Bette Davis Park. Those in attendance were thrilled to be able to access the river, see a daylighted stream, and marvel over the native vegetation that was thriving where once there was concrete. We saw abundant bird life, and some of us even dangled our toes in the water.

Alternative 20 will enable our residents to enjoy the river, recharge precious groundwater, expand already established public park space by linking it to the river, and create a more robust habitat for wild life. The other alternatives fall far short of these very worthy goals. I do understand that Alternative 20 has the highest projected costs of all the alternatives, but in the big scheme of things it will be money well spent. Jobs will be created during both the construction phase of the project and for future care and maintenance of the system, and priceless open space will be woven into the fabric of our ever growing city.

Thank you for your consideration.

Sincerely,  
Cindy Hardin



**From:** [ADRIENNE HATRICK](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles river project.  
**Date:** Monday, November 04, 2013 5:06:49 PM

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I am co president of Democrats for Neighborhood Action and our group would like to urge the Army Corp of Engineers to opt for the Alternative 20 Plan for the Los Angeles River. Thank you for this opportunity to voice our opinion.  
"Adrienne"

Adam Hauck  
3511 Greensward Road  
Los Angeles, 90039

September 23, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers

ATTN: Ms. Erin Jones, CESPL-PD-RN

P.O. Box 532711  
Los Angeles, California 90053-2325

Dear Mrs. Axt,

**RE: Los Angeles River Feasibility Study Alternative 20**

I'm writing this letter in response to the U.S. Army Corp of Engineers Los Angeles River Feasibility Study. I stand with Councilmembers Mitch O'Farrel and Gil Cedillo in support of Alternative 20 to the plan.

I believe that Alternative 20 is an opportunity to breath new life into the Los Angeles River Valley, and to restore precious ecosystems that have suffered the consequences of many years of mistreatment and neglect. As a local resident, I'm also enthusiastic about the prospect of being able to share the river with my family, friends and neighbors. This plan is an incredible step towards remaking Los Angeles into the vision of a truly modern city, which can serve as a beacon of progress and modernity throughout the United States, and the world at large.

Thank you for allowing the community a voice in this process. I will be attending the October 17<sup>th</sup> public meeting to reiterate my opinion, and hope this will be considered when making a determination on the future of the LA River Valley.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Hauck', with a large, sweeping initial 'A'.

Adam Hauck  
Resident, Atwater Village

18 October 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

My name is Sarah Hays. I am a resident of Rancho Park in West Los Angeles. I grew up in Los Angeles and have seen (or not seen) the LA River all of my life. I have also lived in other cities like Rome, Italy and Cambridge and Boston, Massachusetts where rivers are a focal point of the urban fabric, and I have always wished that our river could be more than a concrete storm drain. As an architect I know what a profound effect the existence of a living and accessible river can have on the city's identity. And as an advocate for the Expo Light Rail Line here in West Los Angeles, I look forward to being able to put my bike on a train to be able to access the great biking opportunities along the river. Improvements to the LA River will benefit not only the residents adjacent to it; they will create a space that residents from all over the city can relate to and enjoy. I am writing you in the name of millions of residents of Los Angeles who can benefit from the better balance of our environment and urban community that this project can provide.

Thank you for the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report. Of the four alternatives studied, you have recommended one, Alternative 13. However, Alternative 13 does not go as far as it should to restore the river ecosystem and integrate the river into the neighborhoods it traverses by expanding access. Though your study is meant to address solely ecological benefits of a river restoration, the LA River ecosystem includes the human residents of the city, and an effort to restore ecosystem is wasted if it does not take this into account. Alternative 20, though more expensive, would provide several key elements that are important to this project:

- The inclusion of a connection to Verdugo Wash and its river corridor to the mountains provides life-supporting connections for the animals in the ecosystem. It is a critical component of any ecosystem plan.
- The inclusion of Piggyback Yard connects the Los Angeles River with over 100 acres of open space by removing concrete from the channel and replacing it with terracing and new riparian habitat in a highly urbanized area of the City. This increases biodiversity and the ability of species to find refuge in biologically stressed situations as well as providing opportunities for people to interact with this habitat. Piggyback Yard is fundamental to ecosystem restoration.

- The doubling of the length of the river included in the project is of incalculable value both to plant and animal species and to the human environment and minority communities in particular in a city with seriously inadequate open space and recreational opportunities.

Alternative 20 is the most complete, cost effective, and acceptable plan in terms of true ecosystem restoration and sustainability. If you are going to spend the money to restore part of the river, don't go half way! I urge the Corps to select Alternative 20 as the final Federal plan. This is the right plan for restoring the ecosystem values lost by the channellization of the Los Angeles River and for increasing the connection to the river for the people of Los Angeles.

Sincerely,



Sarah Hays  
Co-Chair Light Rail for Cheviot  
Member of the Urban Design Committee for the Expo Light Rail Line Phase 2

Cc Friends of the Los Angeles River  
Councilmember Paul Koretz, District 5  
Councilmember Gilbert Cedillo, District 1  
Councilmember Tom LaBonge, District 4  
Councilmember Mitch O'Farrell, District 13  
Councilmember Jose Huizar, District 14

**From:** [Joanne Hedge](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [joanne@hedgereps.com](mailto:joanne@hedgereps.com)  
**Subject:** [EXTERNAL] SUPPORT FOR ALT. 20 L A RIVER RESTORATION PLAN  
**Date:** Monday, September 30, 2013 1:23:14 PM

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9-30-13

THIS IS TO PERSONALLY SUPPORT THE LOS ANGELES RIVER RESTORATION PLAN ALTERNATE 20, AS A LONGTIME RIVER-ADJACENT PROPERTY OWNER. THE GLENDALE RANCHO NEIGHBORHOOD ASSOCIATION AND RIVERSIDE RANCHO RESIDENTS WORKED TO ADVANCE AND ENJOY THE NEW GLENDALE NARROWS RIVERWALK PARK AND RESIDE STEPS FROM THE BELOVED RIVER WHICH SO MANY BELIEVE NEEDS TO BE MORE RECREATION- AND CONSERVATION-FRIENDLY WHILE REMAINING SAFE FROM FLOODING. THANK YOU!

JOANNE HEDGE  
1415 GARDEN STREET  
GLENDALE CA 91201  
[hedgegraphics@earthlink.net](mailto:hedgegraphics@earthlink.net)

---

Associated with:

Joanne Hedge, President  
**GLENDALE RANCHO NEIGHBORHOOD ASSOCIATION**  
1415 Garden Street, Glendale CA 91201  
818-244-0110  
[hedgegraphics@earthlink.net](mailto:hedgegraphics@earthlink.net)

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**From:** [Gene Hernandez](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River.  
**Date:** Saturday, November 16, 2013 11:13:42 AM

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Why are you being so obstinate in regards to the L.A. River- I can remember when the ARMY CORP OF ENGINEERS RUINED HANSON DAM BY DUMPING MILLIONS OF TONS OF CONCRETE AND REFUSING TO REMOVE IT. YOU SIMILARLY WILL NOT COOPERATE WITH THE CITIZENS OF SYLMAR TO CREATE A RIPARIAN HABITAT TO INCREASE WATER ABSORBATION FROM THE PACOIMA DAM. IT APPEARS YOUR AGENCY EXIST TO HARM THE PEOPLE NOT HELP THEM-THAT NATION REMEMBERS THE SHODDY AND CORRUPT WORK YOU DID IN NEW ORLEANS.

Eugene Hernandez



**From:** [Peter Hess](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments on Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report  
**Date:** Wednesday, November 06, 2013 8:55:37 PM

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Dear Dr Axt or To Whom it May Concern--

Regarding the restoration of the Los Angeles River ecosystem, I wish to indicate my support for **Alternative 20**.

I believe we owe it to the river that we largely decimated, the wildlife which depend on it and to the citizens of the city to restore the system to as close to something approximating a natural state as we possibly can. While the cost is tremendous, I think that the future economic and environmental benefit is incalculable.

Thank you for your consideration.

Sincerely,

Peter and Marguerite Hess  
336 S. Ave 52  
Los Angeles, CA 90042

**From:** [Kimberly Hidalgo](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL]  
**Date:** Monday, November 18, 2013 2:05:07 PM

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To whom it may concern:

Alternative 20 would be the best choice because the LA river requires to be completely fix. There would be no point on fixing the beginning of the rive if the end is the most important part of it because it is the part that filters the water that is leading to the ocean.

**From:** [Charlotte Hildebrand](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 for the LA River  
**Date:** Thursday, October 17, 2013 9:13:48 PM

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Dear Army Corps of Engineer;

I long to see our river become a river again. The best plan for that is Alternative 20. \$1.08 billion is not a lot for future generations, and for present and future wildlife that will need more habitat in an ever increasing crowded urban environment. Alternative 20 would restore Verdugo Wash and link it to the Verdugo Hills, which would open up a wide swath of nature. I'm all for nature and not so much for half measures, which Alternative 13 would turn out to be. Thank you.

Best,  
Charlotte Hildebrand  
4267 San Rafael Ave.  
Los Angeles, CA 90042

**From:** [Alexandra Hopkins](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please choose Alternative 20 for restoration of L.A. River  
**Date:** Friday, October 11, 2013 6:59:58 PM

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Dear Army Corps:

I urge you to switch your selection for the restoration of the L.A. River to Alternative 20, which will enhance community use of the L.A. River by creating additional green spaces and paths.

Sincerely,

Alexandra Hopkins

La Crescenta, CA 91214

November 18, 2013

Dr. Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325Dr.

ATTN: Ms. Erin Jones, CESPL-PD-RN

SUBJECT: Request to Select Alternative 20 in the Draft Los Angeles River Ecosystem Restoration Feasibility Report

Dear Dr. Axt:

Thank you for your tremendous effort over the past several years in bringing the subject report to fruition. The importance of the restoration of the ecosystem of the Los Angeles River cannot be overestimated, for the region, or the nation. This river feeds and drains the most populous county in the United States. Over 10 million people who are a part of this ecosystem will benefit from the vision your plan clearly defines.

I believe the report should be concluding with a selection of Alternative 20 as the recommended alternative. It appears the recommendation for Alternative 13 is completely based on the economic analysis of costs per habitat unit. Throughout the report, tables and graphs indicate respective outputs as the planned features incrementally increase across the alternatives. I understand how the graphs show that the bulk of the habitat units—almost 6,000 average annual habitat units (AAHU)—are realized by \$21M in annual cost, and that less than 1,000 AAHU more would cost an additional \$30M in annual cost. I agree that—purely through the use of the incremental analysis tool, IWR-Plan—the larger alternatives appear to be less cost effective. However, I suggest the Corps of Engineers has not considered numerous other indicators in your decision-making as outlined below.

I strongly encourage you and your organization to reconsider your recommendations, and select Alternative 20, for the following reasons:

- 1) Regional Economic Development benefits. I understand that RED benefits are often examined in less detail for most water resources planning projects than National Economic Development (NED) benefits or National Ecosystem Restoration (NER) benefits. However more recent Corps narrative and indeed one of the objectives for revising the Principles & Guidelines is for greater emphasis on non-traditional factors in the planning of water resources projects, with greater consideration for the environment, social effects, and public safety by using “assessment methods that reflect the value of projects for low-income communities.” Indeed, your own Engineering Circular, EC 1105-2-409, “Planning in a Collaborative Environment,” places a “much greater emphasis on the broad range of considerations in planning besides the National Economic Development (NED) effects,” and, ostensibly, besides the NER effects. To this end, the results of the RED analysis are included in the report but don’t seem to be used in the decision of a Tentatively Selected Plan (TSP). The RED comparisons between Alternative 13 and Alternative 20 are actually staggering (all figures approximate):

- a. In the category of construction impacts related to ecosystem features, an increase in Jobs from 2,000 to 9,000, in Labor Income from \$114M to \$518M, in Sales from \$274M to \$1.2B, and in the Gross Regional Product from \$160M to \$724M – all representing a 450% increase.
- b. In the category of construction impacts related to redevelopment, an increase in Jobs from 1,280 to 5,090, in Labor Income from \$85M to \$336M, in Value from \$116M to \$460M, and in Output from \$193M to \$767M – all representing an approximate 400% increase.
- c. In the category of long-term economic impacts related to redevelopment, an increase in Jobs from 2,670 to 675, in Labor Income from \$965M to \$3.8B, and in Local Taxes from \$5.8M to \$23M – all representing an approximate 400% increase.

In today's economics, with ongoing discussion of additional stimulus authorities, and with the Administration calling for Increased spending on infrastructure because it "creates jobs, it puts people to work," this differentiation in RED benefits among the alternatives cannot be ignored.

- 2) Use of IWR-Plan as a sole indicator of economic benefits. All of the final array alternatives including Alternative 20 are indeed cost effective—"Best Buys," in fact, according to the IWR-Plan terminology. So the additional cost over Alternative 13 still returns a valid return on the investment albeit with diminishing returns. This is typical of incremental analyses, of course, but doesn't mean that Alternatives 16 or 20 are not cost effective. I would expect that even if only IWR-Plan were used as a criterion for decision-making, as it appears to have been, the additional value of larger alternatives that were still cost-effective would provide justification for their selection. Through review of the alternative matrix and additional plan formulation information in the report, there were numerous other "Best Buy" and cost effective alternatives that were identified, e.g., tunneling and underground storage, but that were discounted due to reasons including cost considerations. Because of this, Alternative 20 does not truly rank as "the most expensive alternative" and should not be viewed as such.
- 3) Other Social Effects benefits. EC 1105-2-409, "Planning in a Collaborative Environment," mentioned above, also puts a greater emphasis on the importance of social factors in plan selection. The Draft report contains a paragraph exactly indicative of the importance of the Other Social Effects (OSE) account:

"Social effects in a general sense refer to a concern for how the constituents of life that influence personal and group definitions of satisfaction, well-being, and happiness are affected by some condition or proposed intervention. Well-being is an ensemble concept composed of multiple dimensions. While economic factors are very important in characterizing well-being there are many more factors which come into play. In particular the distribution of resources; the character and richness of personal and community associations; the social vulnerability and resilience of individuals, groups, and communities; and the ability to participate in systems of governance are all elements that help define well-being."

Per the Corps of Engineers' guidance in applying OSE analyses to plan selection, the Draft Report also contains numerous examples where these social effects—health and safety, economic vitality, social connectedness, community identity, community participation, and recreational activities—are improved across the array of alternatives. Admittedly more difficult to model quantitatively, your report nevertheless includes a myriad of examples and investigative data supporting the connection and relevance of habitat, environmental health, and recreation to the very factors considered in an OSE analysis. It is clearly stated that the scale of the respective alternatives supports the differentiation between them. And so, the increases in economic development, mentioned above, as well as an increase of 22% in the amount of habitat alone from Alternative 13 to Alternative 20



provides support for determining that Alternative 20 would result in the greatest increase in OSE benefits.

- 4) Water Quality. While not a direct mission of the Corps, water quality is of course of concern. Here, again, Alternative 20 outperforms Alternative 13 by virtue of its greater acreage of wetland marsh that would provide a cleansing effect on surrounding stormwater flow. It provides almost 50% more acreage of freshwater marsh habitat, and is more effective in helping to meet TMDL wet-weather targets especially for heavy metals (copper, lead, and zinc) and bacteria. The percentage of constituent concentration reduction required to meet TMDL targets that is achieved by in-stream freshwater marsh habitat is expected to be approximately 75% higher in Alternative 20 compared to Alternative 13. This truly speaks to multi-objective planning.

Thank you very much for your consideration. I look forward to the final decision, and look forward to a change in the Tentatively Selected Plan to Alternative 20.

Sincerely,

Mark Horne

**From:** [jhoughca\\_](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please choose Alternative 20  
**Date:** Saturday, November 16, 2013 11:20:34 AM

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Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711

ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Josephine R. Axt

My name is Jessica Hough and I live in the Los Feliz neighborhood of Los Angeles. I'm a bird watcher and deeply appreciate the habitat that the river provides for local and migrating birds. My daughter is an elementary school student at Ivanhoe Elementary School and has learned about habitat, diversity, and adaptation through the river. We want to use the river more often for exploring, learning, and exercise but access is limited and we don't always feel safe and are often disappointed by the trash and neglect. I have a five month old son and I hope that when he is in elementary school the river will be an even stronger and more lively habitat than it is now.

Please seize this opportunity to remove more concrete, create more habitat, connect important corridors, and conserve more open space for the health of the wildlife and people of Los Angeles by choosing ALTERNATIVE 20. Through this action you will teach our children that the health of our environment matters and that fighting for it is imperative.

Thank you,

Jessica Hough  
3167 Rowena Avenue  
LA CA 90027

--

Jessica Hough  
(510) 881-3072

**From:** [Cathy Hrenda](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 is the right choice for Los Angeles River  
**Date:** Monday, November 04, 2013 10:13:18 AM

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Hi Army Corps of Engineers!

The best LA River restoration plan is the most comprehensive.

Please support Alternative 20.

Use this opportunity to give Los Angeles the river connection that it needs.

Thank you for your help!

-Cathy Hrenda

-Stephen Meek

PO Box 10026  
Glendale, CA 91209

**From:** [Alec Hudnut](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Sunday, November 17, 2013 9:28:08 AM

---

Please consider Alternative 20 and not Alternative 13  
We think it will make a better urban river system  
Thank you  
Alec hudnut  
4093 San Rafael ave  
La ca. 90065

Sent from my iPhone

**From:** [Husseini, Salah](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support Alternative 20 - LA River Restoration  
**Date:** Tuesday, September 24, 2013 9:27:48 AM

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Dear Ms. Axt:

I am writing to give my support to Alternative 20 of the Army Corps' LA River revitalization options. As a resident of the area who utilizes the river's bike path regularly, this river and surrounding infrastructure represents what LA is in dire need of – accessible public parks and pedestrian-friendly pathways that create linkages between various neighborhoods in the area. The Griffith Park to Downtown corridor is a vibrant and thriving part of the city, but neighborhoods within this zone are isolated and not connected. The city and river deserve the most comprehensive renovation of this crucial resource, one that maximizes its potential to create a cohesive and vibrant area that will connect neighborhoods and bring isolated communities together.

I urge the Army Corps of Engineers to reconsider its selection of Alternative 13 in favor of Alternative 20.

Best,

Salah Husseini  
Senior Analyst  
International Labor Standards  
The Walt Disney Company  
500 S Buena Vista St, Burbank, CA 91521-6706  
Phone: 818-627-4576 | Tie Line: 8655-4576 | Fax: 818-627-4602  
[salah.husseini@disney.com](mailto:salah.husseini@disney.com)

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**From:** [Michele Hutchins](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Embrace Alternative 20  
**Date:** Sunday, November 17, 2013 11:09:11 PM

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Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms Erin Jones, CESPL-PD-RN  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

As a longtime resident of the San Fernando Valley, I would like to give you my opinion about the restoration of the Los Angeles river. I feel strongly that the best plan is "Alternative 20" covered in your LA River Ecosystem Restoration Report, which I have viewed on your website (<http://www.spl.usace.army.mil>).

The consequences of this decision will be felt for a very long time. Alternative 20 should be embraced as the best option to achieve the desired balance between the environment and the urban community. Therefore, I agree with FoLAR, Mayor Garcetti, Senator Boxer, and many, many others who urge you to adopt it.

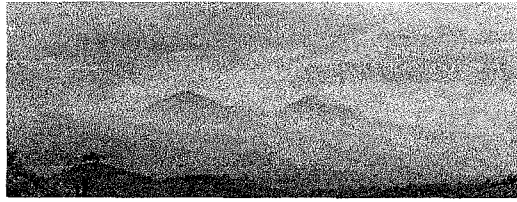
Alternative 20 is the most comprehensive and sustainable of the plans being considered. Selecting another plan could lead to decades of unresolved issues requiring additional funding to mitigate. Over the long term, those costs could easily dwarf the larger price tag of Alternative 20. Selecting another plan would be "penny wise and pound foolish."

Please do not miss this opportunity to restore the river in a way Los Angeles can be proud of.

Yours sincerely,

Michele Hutchins  
6904 Ranchito Avenue  
Van Nuys, CA 91405  
[meeshie4peace@yahoo.com](mailto:meeshie4peace@yahoo.com)





## Clifford Hutson

November 16, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

The purpose of this letter is to urge the adoption of Alternative 20, as presented in the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report, as the means to restore the river to its rightful state.

I am a Nature Interpreter at Rancho Santa Ana Botanic Garden in Claremont, California. I work at the intersection of research, education, and outreach through my participation in various programs that instruct the general public and students about the importance of California's native plants, natural history, and indigenous cultures. However, it should be noted that these comments in support of Alternative 20 are my own.

While I am no longer a resident of the City of Los Angeles, some sixty years ago, I spent many hours of my formative years playing in the river and along the banks of what was then known as Frogtown. I grew to appreciate that patch of nature in an environment of homes, factories, and railroad yards. The river still holds a special place in my heart. And, of course, the it is of great regional importance and ultimately affects all residents of Southern California.

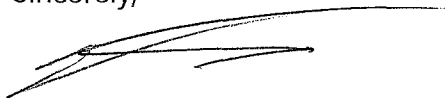
I understand that Alternative 13 has been identified in your study as the Tentatively Selected Plan. However, I find this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River system.

I suggest that Alternative 20 is preferable to Alternative 13 for the following reasons:

- It is more similar to the ecosystem that historically existed prior to the channel
- Connectivity for wildlife migration, seed dispersal, and hydrology
- The creation of more acres of restored habitat
- The Verdugo Wash is critical to providing connectivity from the LA River to the Verdugo and San Gabriel Mountains
- The Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to Elysian Park
- The reduction of distances between the habitat nodes greatly enhances the value
- The length of area restored is greater
- Much more concrete is removed
- The habitat restored creates a higher quality ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the nineteen performance targets established under the posited objectives
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

It is my sincere belief that Alternative 20 is worth any additional costs because of the added values stated above that were not sufficiently counted in the report comparisons. I implore the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future. Your attention to this matter is appreciated.

Sincerely,



Clifford Hutson

**From:** [Jackson, Malcolm](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River restoration - Do Alternative 20  
**Date:** Tuesday, November 19, 2013 12:34:44 PM

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To whom it may concern,

There's no other option, but as much restoration as possible. LA and Angeleno's deserve it. We're a world class city, lets keep it that way.

Please do Alternative 20.

Thank you.

MALCOLM JACKSON  
flash production artist

RPA ADVERTISING  
2525 colorado ave. santa monica ca 90404  
T 310-633-6533  
[mjackson@rpa.com](mailto:mjackson@rpa.com)



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**From:** [Linda Javier](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Restoration of the Los Angeles River  
**Date:** Thursday, October 31, 2013 2:48:55 PM

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I am writing to you regarding the restoration of the Los Angeles River. Please note I strongly support Alternative 20. I am aware that the cost of Alternative 20 is much higher than other options, but I feel that it will provide the highest long-term benefit.

Thank you.

Linda Javier  
343 N. Niagara St.  
Burbank, CA 91505

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**From:** [darynne.jessler](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Restoration  
**Date:** Tuesday, October 15, 2013 4:04:17 PM

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Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, CA 90053-2325

Dear Planning Division,

I emphatically support Alternative 20, the most robust habitat restoration plan. I know a large coalition of environmental groups and elected officials at all levels of government join me in support this significant investment in the highly-degraded Los Angeles Watershed.

Although I live in Studio City, an area not directly affected by this current project, I walk my dog along the river/wash twice a day. We've done this for the past 10 years. I pick up trash, call in graffiti removal and requests to remove bulky trash from the wash. All of this because there is still life trying to keep going along the wash. They won't give up so I don't give up. Ducks, Horned owls, Copper's Hawks, Red Tail Hawks, all sorts of smaller birds, Herons, possums, squirrels, racoons, coyotes, insects of all sorts can all still be seen even tho the place is solid concrete.

In addition I work for a major studio in Burbank that borders the river - still not part of the directly affected area BUT the impact of this project will have a huge effect up river and I want it to be supportive of wildlife. Please choose Alternative 20.

Sincerely,  
Darynne Jessler  
4408 Gentry Ave  
Valley Village CA 91607

November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
Email: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

My name is Christine Jocoy and I am a resident of Long Beach, CA. I moved to Long Beach in 2004 after completing my PhD in Geography for a faculty position at California State University, Long Beach. I feel connected to the ARBOR Reach restoration plan in numerous ways. First, living at the mouth of the river, I understand the importance of restoration upstream to improve water quality and flow downstream. I see the impact on the beaches of trash that flows from all part of Los Angeles. Second, as a geography professor, I teach my students about the history of the river and it is a valuable site for research and educational opportunities for students. I am passionate about changing their relationship to the river so they view it for its ecological and cultural value. I am dedicated to creating a better balance of our environment and urban community.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked together.

I support Alternative 20 as presented in the document for the following reasons:

- 1) Because only 11 of the 51 miles of the river have been identified as having the highest potential for restoration, it is crucial that these areas be addressed to the fullest extent possible.
- 2) With the focus on connecting the river to major tributaries and the mountains, it is important to include the Verdugo Wash confluence in the plan.
- 3) Because buffer areas between development and the river are generally rare, it is important to leverage the locations where current parks provide the opportunity to widen, terrace, and restore the river channel and wetlands. Alternative 20 is the only one that includes Bette Davis Park and LA River State Historic Park, two areas where these restoration strategies can be implemented.
- 4) Because Piggyback Yard connects the Los Angeles River with over 100 acres of open space, the plan for removing concrete from the channel and replacing it with terracing and new riparian habitat has immeasurable benefits to a highly urbanized area of the City. The biodiversity created and the ability of



species to find refuge in biologically stressed situations makes this part of the plan fundamental to ecosystem restoration.

I urge the Corps to select Alternative 20 as the final Federal plan, going beyond recognizing it is the locally preferred plan. This is the right plan for restoring the ecosystem values lost by the channelization of the Los Angeles River and the benefits to the people of the region will go beyond the ecological benefits by changing their relationship to the river.

Sincerely,

A handwritten signature in cursive script, reading "Christine L. Jocoy".

Dr. Christine L Jocoy, PhD  
420 Redondo Ave Unit #305  
Long Beach, CA 90814

Professor of Geography  
California State University, Long Beach

**From:** [Juergens, Kate](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] support for LA River restoration project  
**Date:** Monday, November 18, 2013 6:13:06 PM

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I would like to add my name to those who endorse the more comprehensive **ALTERNATIVE 20**.

This is an amazing opportunity to impact the future of Los Angeles and add to the diverse habitat and beauty of this city.

Let's seize this opportunity to remove more concrete, create more habitat, connect important corridors, and conserve more open space for the health of the wildlife and people of Los Angeles.

Thank you,  
Kate Juergens

**From:** [Carolyn Kammerer](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Select Alternative 20  
**Date:** Saturday, October 12, 2013 9:13:00 AM

---

We must seize the opportunity to remove more concrete, create more habitat, and restore more wetlands for the health of the wildlife and people of Los Angeles. Please select Alternative 20 to restore and heal the Los Angeles Watershed.

Sincerely,  
Carolyn Kammerer

**From:** [Fred Kaplan](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Fred Kaplan's comments regarding Alternative 20 of the Los Angeles Restoration  
**Date:** Monday, November 18, 2013 2:05:07 PM

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My name is Fred Kaplan. As a life-long resident of Los Angeles, I have always been curious about the Los Angeles River but it wasn't until I got laid off from my job at the Tonight Show in 2008 that I approached the river. My 90 day walk along the banks of the river resulted in a short documentary called the "The River Under the City of Angels" [www.fredkaplan.net](http://www.fredkaplan.net). The documentary has been seen in over 90 countries by 50,000 people as well as in 12 film festivals.

The Los Angeles River changed my life, while walking my thoughts would often drift to compassion for others and the acceptance of the changes in my life. The River is part of my healing watching people from diverse cultures interacting with the river confirmed the importance of the revitalization of the river and the need for more open spaces in south Los Angeles. The alternative 20 would bring value to the city that would be returned many times over and create a healthier city.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the

- bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Fred Kaplan

**From:** [Daveed Kapoor](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Study  
**Date:** Monday, November 18, 2013 1:23:01 PM

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Dear Dr. Axt:

My name is Daveed Kapoor, I am an architect and property owner near the Los Angeles River. I work at RAC Design Build, a planning, development, architecture, and construction firm with headquarters right on the river path in the Glendale Narrows soft bottom portion of the river. I use the river walk/bike path as my primary means of transportation. I love the birds and wildlife that populate the river, but I despise the blighted neglected concrete banks and yearn for an upgrade to the channel.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

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- The richness of this biodiversity hotspot
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- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)



- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Daveed Kapoor AIA  
**RAC DESIGN BUILD**  
3048 North Coolidge Avenue  
Los Angeles, CA 90039  
c | 323.252.8510  
f | 888.808.3711  
[www.racdb.com](http://www.racdb.com)  
[www.studiocortez.com](http://www.studiocortez.com)  
[www.vimeo.com/racdb](http://www.vimeo.com/racdb)

**From:** [Christian Kasperkovitz](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] yes on 20  
**Date:** Monday, November 18, 2013 9:40:05 PM

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to whom it may concern,

please choose alternative 20.

The state of the river and the city is as it is because since the beginning of the city short term solutions were found for civic development.

We rank among the lowest for parks per capita, which affects deeply the quality of life, education, and opportunities for youth and future generations.

We are in a state of constant water difficulty because the channelization of the river did not accommodate the hydrologic cycle of the basin.

Our natural heritage is at risk by being even further fragmented.

Ocean health is very impacted by the "flushing" of the concrete environs of the river bed.

Choosing alternative 20 represents taking a step in the direction of planning a robust, vibrant, and unique Los Angeles of the future.

It provides the best solution for continuing development of healthy and diverse neighborhoods with more equal access to all Los Angeles offers.

It provides an opportunity to make a green city, connecting us to our unique natural environs, something in the future which will truly distinguish Los Angeles as a liveable place.

Making a choice now to build on a plan that supports our native wildlife is humane and offers the most flexibility for ensuring a beautiful and diverse future city-scape.

Evidence abounds about the precarious and under-protected state of our oceans. As a coastal city and riparian city we gain immensely from our access to water. Lets utilize that in an intelligent and sustainable way.

with many thanks,  
Christian Kasperkovitz

From: [Dessa Kaye](#)  
To: [SPL Comments LA River Study](#)  
Subject: [EXTERNAL] LA River Restoration Comments  
Date: Thursday, November 14, 2013 3:37:03 PM

---

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms Erin Jones, CESPL-PD-RN  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

As a native and lifelong resident of the San Fernando Valley, I am a stakeholder in your plans for the restoration of the Los Angeles River. I believe we have a once-in-a-lifetime opportunity to create a better balance between our environment and urban community.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with Friends of the Los Angeles River (FoLAR) and other community groups in developing these options. After reviewing the report and many commentaries, I am writing **in support of Alternative 20** presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

As detailed by FoLAR, many major concerns were not adequately recognized in Alternative 13, such as the richness of this biodiversity hotspot and the rarity of the region's Mediterranean climate.

I agree with FoLAR, Mayor Garcetti, Senator Boxer and others that Alternative 20 is far superior to Alternative 13. Alternative 20 most robustly meets the four evaluation criteria (effectiveness, completeness, efficiency, acceptability).

Having grown up in the Valley in the 1950s and 1960s, I understand that we don't want to go back to a totally wild river that changed course with every rainy season, but we have one chance here to restore this ecosystem to something more likely to be sustainable and resilient over the life of the project because of the size and added connectivity. There's no point in saving money if it doesn't get the job done.

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values it will produce that were not sufficiently counted in the report comparisons. I urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Dessa Kaye  
P.O.Box 1397  
Studio City, CA 91614  
[dlkaye@juno.com](mailto:dlkaye@juno.com)

**From:** [T. Scott Keiner](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative 20  
**Date:** Wednesday, October 16, 2013 1:06:15 PM

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Alternative 20 is the only proper solution to restore the LA River. Please support it.

Thank you,  
Scott Keiner

**From:** [Celeste Kelley](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Tuesday, October 22, 2013 11:57:42 AM

---

Hi Dr. Josephine Axt,

I am a proud Angeleno in support of Alternative 20. Please support this Alternative to invest 1 billion in the L.A. River and provide greening of our city, habitat restoration, and recreation opportunities for the people.

Thanks,

Celeste Kelley



**From:** [Saran Kirschbaum](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Wednesday, October 09, 2013 11:49:46 AM

---

Alternative 20 makes more sense because it will avoid future problems, so in the long run it will be less expensive.

Thank you,  
Saran Kirschbaum  
Los Angeles

**From:** [joan.klengler](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. River  
**Date:** Monday, November 18, 2013 12:07:09 PM

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In the **Los Angeles River Ecosystem Restoration Integrated Feasibility Report**, the U.S. Army Corps of Engineers chose Alternative 13 as their Tentatively Selected Plan.

FoLAR and a large coalition of elected officials and environmental groups agree that this plan **FAILS TO CONSIDER** key factors of our unique environment and **FALLS FAR SHORT** of achieving meaningful transformation in our degraded urban watershed.

Instead, we strongly endorse the more comprehensive **ALTERNATIVE 20**.

Alternative 20 removes more concrete, creates more habitat, connects important corridors, and conserves more open space for the health of the wildlife and people of Los Angeles.

We urge you to adopt Alternative 20.

Thank you for considering our views.

Joan and Ingolf Klengler  
[klengler@sbcglobal.net](mailto:klengler@sbcglobal.net)

**From:** [Francie Kugelman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Teacher supports Alternative 20 for the Los Angeles River  
**Date:** Saturday, November 16, 2013 5:34:51 AM

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Every year I take my students to the Los Angeles River on a field trip. What surprises the students is how beautiful the river is. Everyone thought before we left that it was just concrete, and no animal life could live. Instead, they see trees, birds, frogs. Alternative 20 will help the river have more areas like this. People will learn to come to our river and enjoy it.

Please support Alternative 20. I believe it is the right choice for Los Angeles.

Francie Kugelman  
Dahlia Heights Elementary School  
5th Grade teacher  
5063 Floristan Avenue  
Los Angeles, CA 90041

From: noreply@dma.mil [<mailto:noreply@dma.mil>]

Sent: Saturday, November 02, 2013 12:15 AM

To: Walters, Candice S HQ02

Subject: [EXTERNAL] Headquarters U.S. Army Corps of Engineers Contact Form: L A River

This message was sent from the Headquarters U.S. Army Corps of Engineers website.

Message From: Fred & Sheri Kuppers

Email: [skuppers@verizon.net](mailto:skuppers@verizon.net)

Response requested: Yes

Message:

Army Corp of Engineers,

After visiting Germany and traveling on the River Rhine, we began to wonder what happened to the LA River. After hearing about the beginning of its revival, we were excited. It could add both beauty and nature to our big city, which needs more of both.

It could be much more than the proposed restoration. The residents should have better access. The steel concrete walls leading down to the river need to be removed and landscaped terraces on its banks created so there are points of access for recreational use.

We understand you are making a final decision next Spring. The residents of L A deserve a good plan and the use of their river. We hope that you will think of the people you represent when making this decision.

Sincerely,

Fred & Sheri Kuppers

Sent from my iPhone

**From:** [Jim Lamm](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A.River Restoration Comments  
**Date:** Sunday, November 17, 2013 9:01:18 PM

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Dear Dr. Axt:

I am writing to express my strong preference for Alternative 20 rather than Alternative 13.

My name is James W. (Jim) Lamm. Although currently a Culver City resident, I was born in Bell, spent my first 3 ½ years in South Gate near the Los Angeles River, and was raised in Monrovia with many experiences of the Rio Hondo and San Gabriel Rivers. Most of my 30-year architectural career was based in Los Angeles, particularly in downtown. While there, I also served as a project unit manager for the Universal City Metro Rail station situated on the route of the historic LA River and next to the rerouted channel. However, my life has been focused more on people and places, especially natural places and waterways.

While serving on the AIA/Los Angeles Urban Design Committee in the early 1990s, I resonated with colleagues' interest and work in watersheds, rivers, and the like. Soon I began participating in the Los Angeles and San Gabriel Rivers Watershed Council, whose founding president Dorothy Green was an early mentor of mine and Ballona Creek Renaissance (BCR), a 501c3 organization dedicated to connecting creek and community. Serving as BCR President since late 1998, I and BCR have experienced many interactions with both the LA River and its stakeholders, coming to appreciate both very much.

Now retired from architecture and in addition to leading Ballona Creek Renaissance and co-founding the Ballona Creek Watershed Task Force, I currently serve on the State Senate District 26 Environmental Cabinet and the Bay Watershed Advisory Committee. And I have enjoyed teaching very hands-on Urban Ecology and Wetlands Ecology classes and workshops at Antioch University-Los Angeles.

With a long professional and nonprofit experience of working collaboratively with all stakeholders, including the U.S. Army Corps of Engineers and the City and County of Los Angeles, I really appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. Along with many of my L.A.River friends, I am very pleased that the Corps and City have worked with the community to be on the same side of the Los Angeles River Ecosystem Restoration!

After reviewing the report, I am providing just a few comments on the document which support my preference for Alternative 20 rather than Alternative 13, the Tentatively Selected Plan. Key areas in which I share FoLAR's points include the following:

- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh

- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20: Provides 7015 more jobs and \$386 million more in wages during construction, creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term, and creates 1094 more new permanent jobs valued at \$62 million more.
- The Other Social Effects analysis shows Alternative 20 with its larger scope will produce a greater connectivity with the people and communities.

Restoration of the Los Angeles River and Ballona Creek is crucial to us and to greater Los Angeles! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. Therefore I urge the Corps and City to select Alternative 20 because it provides the best restoration, the best example from which to teach and to lead, and the best ecological and economic sustainability for the future.

Sincerely,

*Jim Lamm*

*President, Ballona Creek Renaissance (BCR), [www.ballonacreek.org](http://www.ballonacreek.org)  
 Urban and Wetlands Ecology Adjunct Instructor, Antioch University, Los Angeles, [www.antiochla.edu](http://www.antiochla.edu)  
 Co-Founder, Ballona Creek Watershed Task Force, <http://tiny.cc/7k3V2>  
 Elder, St. John's Presbyterian Church, Los Angeles, [www.stjohnspres.org](http://www.stjohnspres.org)  
 Resident and Former Planning Commissioner, Culver City, [www.culvercity.org](http://www.culvercity.org)  
 310-839-6896, 310-367-0336 (c), [www.facebook.com/jim.lamm](https://www.facebook.com/jim.lamm), [jim.lamm@ballonacreek.org](mailto:jim.lamm@ballonacreek.org)*



**From:** [langefunds@gmail.com](mailto:langefunds@gmail.com) on behalf of [Trent Lange](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River -- Please implement Alternative 20  
**Date:** Tuesday, October 22, 2013 2:13:14 PM

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Hi --

As a nearly lifelong Los Angeles resident, I strongly support making the LA river as natural, connected, and open to both the public and to wildlife as possible. So please add my name to the list of people who strongly urge you implement Alternative 20 of the LA River study.

Thank you,

- Trent

424 Kelton Ave, Apt 510  
Los Angeles, CA 90024

**From:** [tim.lavalley@me.com](mailto:tim.lavalley@me.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Sunday, November 17, 2013 7:18:41 AM

---

Dear Dr. Axt and Ms. Jones

This is a very exciting and inspiring moment in the history of Los Angeles. The opportunity that lies before all of us is to revitalize the Los Angeles river in a way that will turn it into a resource of hitherto unknown geographical, economic, civic and even psychological importance to the Angeleno community. I believe that Alternative 20, as endorsed by the Friends Of the Los Angeles River, is the most promising of the options available. I thank you for the attention and stewardship that the Corps expends on the river, and hope that Alternative 20, rather than Alternative 13, is as attractive an option to you and the Corps as it is to FoLAR and myself.

Sincerely  
Tim LaValley  
6200 Franklin Avenue  
Los Angeles, CA 90028

**From:** [Elaine LeBoeuf](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Friday, September 13, 2013 7:25:37 PM

---

I support Alternative 20!,

Elaine LeBoeuf  
323 240-7004  
1838 N.Alvarado St  
Los Angeles, CA90026

**From:** [Larry Legras](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Thursday, October 17, 2013 9:35:45 AM

---

To you,

My family and I support having the entire LA river as natural as possible so adults and children that live in the inner city will be able to experience and learn about the Nature of a beautiful river.

Nature and beauty are healing elements that this city sorely needs.

Sincerely,

The LeGras family.  
1300 Micheltorena St.  
LA, CA. 90026

**From:** [Erik Lerner](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] The public needs LA River Access  
**Date:** Thursday, October 17, 2013 7:48:49 AM

---

Please open the river to the public.  
Urban access to outdoor activities is an essential civilizing benefit to the urban environment.

**ERIK LERNER**

REAL ESTATE BROKER  
AIA CGBP LEED AP

[REALESTATEARCHITECT.COM](#)®  
[ERIKLERNER@REALESTATEARCHITECT.COM](#)

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BEVERLY HILLS  
CA 90210

**From:** [Ely](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Select Alternative 20!  
**Date:** Sunday, November 17, 2013 11:38:12 PM

---

Dear Dr. Axt,

I am a resident of Glendale, and am writing to urge you to select Alternative 20. Only Alternative 20 addresses the problems of the current river on a sufficient scale. Please don't leave Glendale and the Verdugo Wash out! A more naturalized river means a more livable region. Please don't settle for half measures - take this historic opportunity!

Sincerely,

Ely Lester  
1411 Hillcrest Ave.  
Glendale, CA 91202

Sent from my iPad



**From:** [PHILIPPE LINDSEY](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Ecosystem Rejuvenation  
**Date:** Saturday, November 09, 2013 7:02:33 PM

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Dear Josephine R. Axt, Ph.D., Chief, Planning Division, U.S. Army Corps of Engineers, Los Angeles District, P.O. Box 532711, ATTN: Ms. Erin Jones, CESPL-PD- RN, Los Angeles, CA 90053-2325

I am writing to express my support for Alternative 20 of the LA River Ecosystem Rejuvenation. I relocated to Los Angeles last year from Chicago. Specifically, my girlfriend and I moved from Evanston, IL to Downtown Los Angeles (DTLA) for work. We love living downtown, we especially love the continuous local business improvements and new public locations to visit in DTLA. It is with this perspective that I send this note, supporting the comprehensive approach to rejuvenating the LA River.

Chicago (Hyde Park), the city of my birth really benefited from the Burnham plan for the creation of livable space for it's residents. See [http://en.wikipedia.org/wiki/Burnham\\_Plan](http://en.wikipedia.org/wiki/Burnham_Plan) Specifically, the idea of public space that is for all the people in the city has been a tremendous success for Chicago. I like to refer to this as a "public commons" of parks, libraries, and river walks that all families regardless of income or station in life can enjoy. Moreover, these public common places remind people of the importance and beauty of the environment, why we all have to work together to care for our cities and our planet. It is my belief, Los Angeles would benefit from a similar approach to the LA River Basin which Alternative 20 represents. Specifically, the restoration of 719 acres of the LA River basin would be a wonderful public space/ public commons "to green" Los Angeles. People could come to the park to stroll, exercise, or have family outings like picnics. I love the idea of connecting the LA River with the LA Historic State Park by re-creating wetlands and marshlands.

I also think the rejuvenated river will create business opportunities, like Millennium Park has for Chicago. See [http://en.wikipedia.org/wiki/Millennium\\_Park](http://en.wikipedia.org/wiki/Millennium_Park) I have read of discussions to open a brewery, a kayak tour, and new restaurants along the river. As a DTLA resident, I can tell you that we as a couple love walking to Pershing Park, which is across the street from our home to listen to concerts. We also went to the Grand Performances and loved it. If the restored LA River project, Alternative 20 would provide more space for this kind of thing we as a young couple would love it. As we look for places in LA to lay deeper roots and start a family, a thing like an Alternative 20 type LA River Walk would be persuasive to remain in DTLA. May I also suggest a Metro Stop or Stops close to the rejuvenated LA River so people can take public transportation to reach it and patronize its' businesses.

Thank you for your attention these matters, please contact me should you like further support for this initiative.

Respectfully,

Philippe Lindsey, Esq  
(312) 208-7538 (mobile)

**From:** [Dalmatia Lizama](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 2:04:07 PM

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To whom it may concern as a resident of Los Angeles County, I strongly encourage the US Army Corps of engineers to choose alternative 20 for the Los Angeles River Ecosystem Restoration project and not alternate 13.

Please reconsider your selected plan and choose the more comprehensive alternative 20.

Thank You,  
Dalma Lizama

**From:** [gracesadye@gmail.com](mailto:gracesadye@gmail.com) on behalf of [Grace Phillips](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 !!!  
**Date:** Tuesday, November 19, 2013 2:40:05 PM

---

Dear ACE,

Please listen to the members of the public. We want Alternative 20. We don't want other alternatives. If we don't get Alternative 20, there's no telling what we might do. Like try to get the ACE under the purview of locally elected bodies, for example.

Please show the United States that you can be responsive at the local level - you have such a bad reputation as tone-deaf bullies who fire anyone who disagrees with them.

You can do better, starting here, starting NOW, with ALTERNATIVE 20!!

Best,

Grace Lloyd

1131 Hill Street

Santa Monica, CA 90405

--

[www.civilityplease.com](http://www.civilityplease.com)

**From:** [Ian Lundy](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Recommendation of Alternative 20  
**Date:** Tuesday, November 19, 2013 12:23:36 AM

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I am writing because I am excited about the opportunity to give one of the largest populations in the United States the greenway and public space that the Los Angeles area needs. The city lacks a central park of main area, however the creation of an active river way can increase the quality of life for millions and millions of Americans. Please choose this alternative for our city to give it the revitalization that it truly deserves and the public space it needs.

Thank you for your work and I look forward to hearing the results.

Best,

Ian Lundy

**From:** [John MacAdams](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Senator.Pavley@outreach.senate.ca.gov](mailto:Senator.Pavley@outreach.senate.ca.gov)  
**Subject:** [EXTERNAL] Please choose Alternative 20 for LA River  
**Date:** Wednesday, October 09, 2013 10:07:21 AM

---

Dear Army Corp,

As a 30 plus year resident of Los Angeles, and a lifelong outdoors person, I greatly appreciate the benefits of access to outdoor space for the maintenance and growth of the human spirit and societal sanity.

I urge you to adopt the proposed "Alternative 20" plan for the partial restoration of the LA River segment described there in.

I am eager to increase my taxes to help fund this effort.

Warm Regards,

John MacAdams  
[kiltson1@gmail.com](mailto:kiltson1@gmail.com)  
mbl 818-621-9890  
off 818-727-9890

**From:** [Magali](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Monday, November 18, 2013 2:05:26 PM

---

To whom it may concern:

I strongly encourage the US army Corps to choose alternative 20 instead of alternative 13. As a resident of Los Angeles County I care about our environment and we must solve our degraded urban watershed. Thank you.



**From:** [marksjay](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [marksjay@earthlink.net](mailto:marksjay@earthlink.net)  
**Subject:** [EXTERNAL] L.A. River  
**Date:** Sunday, November 17, 2013 11:49:59 AM

---

Dear USACE,

I support the Mayor's proposal to renew the Los Angeles River. As an elementary school teacher, I have used the river as a wonderful resource for environmental education as well as for recreational/ physical education activities. Each year my class takes two walking field trips to the L.A. River. Many parents join the class as I want the community to become more aware of this local natural resource. In my teaching community the families need more free or low cost recreational and natural history resources. This great river provides that. I support the new extensive plan to revitalize and expand the use of the river, and I thank the many Angelenos who have worked so hard to develop this plan.

Sincerely,  
Mrs. Marilyn Marks  
Third Grade Teacher  
Glenfeliz Blvd. Elementary

**From:** [Evan Mather](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River - ALTERNATIVE 20  
**Date:** Monday, November 18, 2013 10:02:37 AM

---

Dear Dr. Axt:

My name is Evan Mather and I am a resident of Eagle Rock and a practicing landscape architect.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river

connections, rather than just culverts or pipes

- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Evan Mather

**From:** [rmayreis@earthlink.net](mailto:rmayreis@earthlink.net)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Restoration  
**Date:** Tuesday, November 19, 2013 7:36:02 AM

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Dear Josephine R. Axt and Erin Jones,

I hope that you can still accept this note as input for the Los Angeles River restoration project. I have enjoyed the annual LA River bicycle ride the past 10 years, particularly the shore birds and the plant ecosystem across from Griffith Park, so I can easily see the potential for great satisfaction for residents and appeal for tourists if the River is allowed to go natural again. I urge you to select Alternative 20 to help bring that about. Thank you for considering this!

Rex Mayreis  
397 E. Las Flores Drive  
Altadena, CA 91001  
[Rmayreis@earthlink.net](mailto:Rmayreis@earthlink.net)

**FoLAR Community Template  
Letter of Comment**

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Date Nov 16, 2013

Dear Dr. Axt:

My name is Ilaria Mazzoleni. I am an practicing architect and professor of sustainable design and biomimicry at SCI-Arc. In the past several years I worked near the river and while teaching we had several design studios focusing on the area adjacent downtown (where sciarc is located). In writing this letter I think I am representing not only myself, but also my students in saying that the river is a fundamental environmental element for LA and for the design community.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

A major concern in my review was that the value of the ecosystem restoration appears to have been determined solely using the Combined Habitat Assessment Protocols (CHAP) model. The CHAP model is designed to address wildlife habitat on a site-specific basis. But does not, however, capture a number of ecosystems values which are important in an urban environment such as Los Angeles. These are values which were essentially eliminated when the Los Angeles River was channelized, and must be considered in reaching a decision on a meaningful ecological restoration alternative.

As a primary example, a principal value not considered by the model is the enormous benefit of connecting major tributary and mountainous areas to the river. Having spoken with several members of the Corps/City/resource agencies team who designated specific values for the model, we believe these connections were not valued or weighted highly enough in the model. A well-balanced ecosystem needs these mountainous connections to be sustainable genetically and in terms of food, cover, refuge, and territories for the flora and fauna that once thrived in and along the LA River. The connectivity to other large expanses of habitat ensure ecological resiliency and long term sustainability. It is precisely these types of historic connections and corridors that could enable the reintroduction of Steelhead and other species into the river by restoring the historic aquatic habitat that once existed in this area.

Verdugo Wash and Piggyback Yard are of particular importance in creating a sustainable ecosystem. The Verdugo Wash tributary to the Los Angeles River northeast of Griffith Park connects the both of these waterways to the San Rafael Hills and the Verdugo Mountains. The river corridor to the mountains provides life-supporting connections for the animals in the ecosystem. During times of biological stress caused by urbanization, fires, floods, and climate change, the survivability of plant and animal life and sustainability of the ecosystem depends on the large expansive connections of the rivers and mountains. The connectivity of the Verdugo Wash to the mountains is a critical component of any ecosystem plan and must be included in the Federal project.

The Piggyback Yard is important in the ecosystem restoration because it connects the Los Angeles River with over 100 acres of open space by removing concrete from the channel and replacing it with terracing and new riparian habitat in a highly urbanized area of the City. The importance to the ecosystem is again the biodiversity created and the ability of species to find refuge in biologically stressed situations. Piggyback Yard is fundamental to ecosystem restoration.

Other values also should be considered in the decision in determining an adequate alternative. These include air quality benefits in a heavily stressed air quality region, hydrologic values, river water quality and storm water capture which are essential to sound habitat restoration, and the value to the human environment and minority communities in particular in a city with seriously inadequate open space and recreational opportunities.

The CHAP model should be considered as an important tool in the planning process, but should not be the only factor used in selecting the alternative plan. The model itself is probably as good as any other; it just did not recognize the appropriate weighted value of other ecosystem restoration benefits. The inclusion of the Verdugo Wash and Piggyback Yard, coupled with the other elements of the plan, provides double the length of channel restoration as Alternative 13, but provides an exponential benefit in the ultimate sustainability of the entire ecosystem.

A second major concern with the Integrated Report is that the Corps has set numerical decision criteria which are inadequate considering its own analysis. As one of a number of examples of this, the Draft, (Executive Summary, p. xxv) states that both the Piggyback Yard and Taylor Yard are "critical to provide restoration benefits" and achieving a more natural hydrologic regime. We would add Verdugo Wash to this considering the importance given by the Draft to connectivity. However, the "objective performance criteria" (P. 4-5) state this goal will be satisfied if *only one* large area river-contiguous area is restored. By establishing an artificially low numerical criteria, Alternative 13, which includes only the Taylor Yard, is clearly inadequate even by the Corps own analysis.

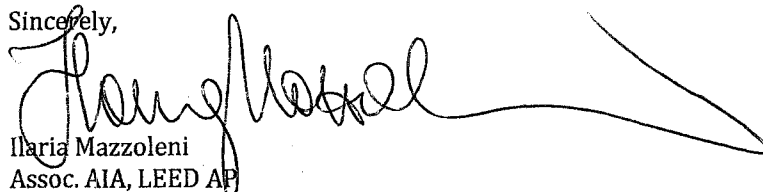
Cost is a factor in today's constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the Los Angeles River to multiple large corridors and refuges in the mountains and along the river banks. In so doing we will restore a balance for the species in the ecosystem and the public within an urban setting.

Real estate costs are a major factor in any development in an urban area, including ecosystem restoration developments. Land acquisitions in the City of Los Angeles will be expensive. However, the scarcity of habitat and ecosystems in an urban area are far more valuable than in other parts of the nation because of that scarcity. The City of Los Angeles is the second largest city in population in the U.S. The value of the ecosystem should be valued even higher in light of the dearth of such habitat in the area.

Alternative 20 is a "Best Buy" plan. It was determined to not be the most efficient of the four final plans as measured by the CEICA. However, Alternative 20 is the most complete, cost effective, and acceptable plan in terms of true ecosystem restoration and sustainability! We believe that if the decision criteria are structured to conform to the Corps' own analysis, and other values discussed above are given adequate consideration, either in additional habitat units or by some other means, it will become clear that the incremental benefits of Alternative 20 relative to the costs will make Alternative 20 the Preferred Plan.

We urge the Corps to select Alternative 20 as the final Federal plan. As Angelenos we will do our part to shoulder our cost-sharing responsibilities. This is the right plan for restoring the ecosystem values lost by the construction of the Los Angeles River and for the people of our great City.

Sincerely,



Ilaria Mazzoleni  
Assoc. AIA, LEED AP  
SCI-Arc Faculty



**From:** [Brian McCain](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please Support Alternative 20  
**Date:** Saturday, November 16, 2013 8:44:29 PM

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Hello,

I live in Council District 1 in Los Angeles, in the neighborhood of Glassell Park. Revitalization of the LA river is a tremendous opportunity to connect the river with its surrounding neighborhoods in a way that makes it accessible to a great number of the residents around the river, and Alternative 20 is the only plan that integrates the river into the community around it. The idea that we could spend hundreds of millions of dollars on a river revitalization project, and still be left with a beautiful park that isn't connected to the river is insane to me. I ask that you please support Alternative 20.

Thank you,  
Brian McCain

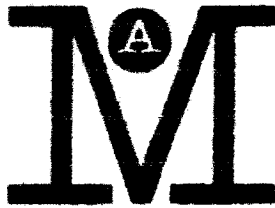
**From:** [Dianemccreary@aol.com](mailto:Dianemccreary@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] do not remove the flood control  
**Date:** Wednesday, October 09, 2013 10:12:58 AM

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I live 1 1/2 blocks from the flood control channel area Tujunga Avenue and Bakman Ave in the 91602 zip code. We have old family photos of this area under water before this flood control on the LA River was built and we still have flooding problems at Moorpark and Tujunga, Bakman and Moorpark when it rains. So why the need to spend money to take this flood control channel out if it will place all of the surrounding property in jeopardy of flooding. When it rains this control channel gets very high and I fear that our property will be flooded out if this safe guard is removed. Also all along the flood control channel in this area there are many large apartment buildings, condo complexes and expensive homes that will be put in jeopardy of flooding if the flood control channel is removed.

Diane McCreary

A concerned property owner that wishes not to be placed under flood control insurance.



November 13, 2013

**STATEMENT of J.H. McQUISTON on  
DRAFT IFR LOS ANGELES RIVER, SEPT. 2013**

Honorable Corps of Engineers:

McQuiston is a graduate of the California Institute of Technology and is a Licensed Engineer practicing engineering in Los Angeles since the 1960's.

**He experienced the great flood of 1938 and remembers it vividly.**

1. McQuiston observed that before flood-control, **ordinarily there was no flow in Valley watercourses except for some storms. Important streets were just paved across watercourse-bottoms and used regularly.**<sup>1</sup>
2. McQuiston's remembrance of the 1930's Valley, East of Sepulveda above Vanowen, is **of a desert populated by sand and gravel production**, except for the presence of "Pop's Willow Lake" in the Tujunga Wash area near the present site of the Hansen Dam lake.
3. McQuiston's remembrance of the "narrows" railroad yards and Downtown during the great flood is of great destruction; water, rail cars and massive debris propelled by high-energy flows battered properties below the narrows. Pop's Willow Lake was scoured into extinction by the 1938 great flood. The Valley became a big lake.
4. McQuiston is grateful the United States constructed its system of Hansen and Sepulveda Dams, other dams and catch-basins, and flood-control channels to **reduce** the damage from flooding.
5. Large ponds now occur behind Hansen and Sepulveda dams; other ponds are now widespread in the area. Creatures now can wander at will on wildlife-paths and will find sufficient water and food for their needs.

**I. System Flaws**

IFR states that **criteria by which the system was designed were flawed**. Remembering the saga of human-error in 1938, noting IFR's data that **current banks are over 5 ft too low for flood-control**, and remembering water "haystacks" that **wet the Los Feliz bridge in minor weather** not long ago, **I believe Southern California is unsafe unless the flood-control channel is re-configured.**

**Vegetation must be removed** from the watercourse. **Occasional water must be enclosed**. **Urban effluent must be removed from the channels**. **Flood-channel bed must be smooth and machine-sweepable**. Rough-wall geometry must be amended to **reduce friction**. **Enlarge capacity** at choke-points. **Channel must withstand major seismic displacement** where it crosses seismic faults.<sup>2</sup>

**IFR shows Los Angeles will be destroyed** by a 1938-type storm with a 7.2 (Richter) seismic event.<sup>3</sup>

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1. E.g, Riverside Drive at Camarillo (Tujunga Wash in 1930's) was dry at crossing, but after rain stopped McQuiston saw a house, undermined, fall into the torrent there. The wash was relocated later.  
Wilbur Ave at Victory (in 1950's) was dry at crossing (L A River), but after a 1950's storm a bridge was built.

2. Responsible authority predicts a displacement from 6 to 30 ft on the Raymond-Hollywood-Santa Monica (etc) fault, compared to 23 ft on the San Andreas fault in 1906.

3. 1938, rain poured without letup for 7 days straight. Climate-change could make the next occurrence more-intense.

## II. PURPOSE per IFR

“The Los Angeles River is a **central component in the [ ] flood risk management project**. [ ] [A]s originally constructed [ ] was **designed to carry a design flood, not a specific frequency event [ ]**. [T]he [ ] channel and dam flood control system **had a relatively low level of flood protection for a metropolitan area**.” IFR at 3-23.

“Existing vegetation within the channel further decreases the [flood protection].” IFR at 3-24.

“[T]he River is an **effluent-dominated waterbody**. Nearly **70 percent [65 cfs]** of the volume in the River [93 cfs] is from **Water Reclamation Plant [ ]**.” IFR at 3-27.

“**Bacteria impairments are not supportive of [any recreational use, active or passive]**. [ ] Reaches [ ] are listed as **impaired for [toxic metal and organic compounds]**. [ ] Trash impairments are **not protective of [any recreational or wildlife] uses**. [ ] Nitrogen impairments are **not protective of aquatic life beneficial uses [ ]**.  
“ IFR at 3-27 & 3-73.

“[C]hannel is **designed to be maintained free of vegetation [ ]**. [L]ack of funds for maintenance has resulted in **substantial vegetation growing in the main channel**. [ ] [Vegetation [ ] is **degraded**.” IFR at 3-34.

“Inventory of larger regional parks [ ] demonstrate the **lack of regional parks and open space in the greater Los Angeles area**.” IFR at 3-61.

“River usually contains a **low volume** of slow moving water which is often **restricted to a concrete slot in the centerline [ ]**.” IFR at 3-70.

“[D]uring periodic storms, the channel volume increases with **rapidly-moving water [ ]** dramatically **increasing the risk of accidental death and injuries to people and animals [ ]**. Much of the River is fenced and signed to **prevent accidental injury or death**.” IFR at 3-70.

“283 stormwater **outfalls throughout** the study area that **allow stormwater** to enter the River.” IFR at 3-81.

Proposed estimated alternative **construction** cost ranges from **\$2 million to \$1100 million**.

Proposed estimated **annual maintenance** cost ranges from **\$146 thousand to \$53,616 thousand**. IFR at 4-38.

“**Objective 1: Restore Valley foothill riparian and freshwater marsh habitat**.” IFR 4-42.

“**Objective 2: Increase habitat connectivity**.” IFR 4-44.

**There are no other Objectives listed.**

## III. General Issues with IFR

**A. The paramount objective of the channel is ignored.**

It is unreasonable to make a channel as large as it exists, to carry **only 28 cfs of water**. The reason for the channel is **flood control**.

**Objective 3 must be set forth: Safety of Los Angeles from natural and preventable disasters.**

**Objective 3 must be paramount** and not be mitigated to permit unnecessary Objectives.

**B. The IFR states the flood capacity of the channel will not safeguard the City of Los Angeles.**

**The IFR states a reasonable flood will over-top the banks over 5 ft. That would be disastrous.**

**It offers no specific cure and cost thereof.**

**The IFR states the design criteria were flawed. The New Orleans design criteria were also flawed. Los Angeles cannot be subjected to a “New Orleans” disaster just because Corps used improper design criteria.**

2

**Particularly, the intrusion of vegetation must be eliminated by means not involving substantial maintenance. The channel must be completely-lined with vegetation-inhibiting, permanent materials.**

3

**Particularly, humans must not be able to approach the channel. Otherwise, objects such as noxious and bulky items will continue to clog the channel. Airborne (and thrown) refuse must be addressed and blocked.**

5

**Particularly, there must be specific descriptions of how each inadequate reach will be modified to obtain appropriate protection for the City.**

2

**It must be possible to clean the channel by mechanical means. What little “normal” flow that occurs should be enclosed in a covered channel to make a smooth bottom which is easily-cleaned of debris.**

3

### **C. Effluent should be addressed as a primary issue in the IFR.**

**California faces water shortages. Los Angeles Basin cannot support itself with just its area’s water alone.**

**Far-off communities now have “their” water taken for the Basin’s use.**

**Other areas in America purify and re-use effluent flowing through channels in their areas.**

**There is no reason why the Basin’s effluent is wasted by discharging it to the Ocean through the channel.**

**Effluent, especially if treated, should not be permitted in the channel. It should be re-used or should re-charge the Basin’s groundwater. Proper re-use is necessary to alleviate California’s water shortage.**

6

### **D. Specific data necessary for reasonable IFR assessment of Listed Objectives is absent.**

**There is no comparative data, other than cost estimates, on current-deprivation by Objective, the net increase obtained by Objective, and comparison of Objective with activity in surrounding Southern California area.**

**Data on shift from surrounding area to study area for each part of each Objective is necessary to make a reasonable assessment of the worth of each part of each objective.**

7

**It appears from inspection of what is presented that BOTH OBJECTIVES ARE UNSUPPORTABLE. Constitutionally, more data proving necessity is required before funding may occur.**

### **E. Area of IFR already contains sufficient regional parks for IFR area’s inhabitants.**

**Recreational use of IFR area is currently-unsafe due to multiple-menaces to public-health.**

**Importantly, the IFR area is not within necessary-distance of almost all the Basin’s inhabitants. The City Plan disallows the IFR area as necessary for its “neighborhood recreation” element.**

8

**Locals already have Debs, Griffin, Elysian, Elyria Canyon, Griffith, North Atwater, Verdugo, Johnny Carson, Buena Vista, North Hollywood, and Weddington Park for regional-park access.**

### **F. City of Los Angeles cannot afford the IFR’s construction and maintenance estimates.**

**Hollywood part<sup>4</sup> of the Los Angeles City Plan requires 105 more 5-acre recreational-parks for its size and population. Each park requires \$30 million for establishment. IFR maintenance would disallow adding such parks, which are required to be within walking or short distance from their usage-populations.**

9

4. Per Calif Govt Code §65301(b), Los Angeles’ §65300- City Plan is a collection of area-elements and general-elements.

**Los Angeles said it cannot afford even one of the 105 parks it requires to be added to that area. It says the same un-affordability applies to each part of the City's statutory-plan.**

Current City budget barely-supports its Police and Fire Departments; current support is described as inadequate. Other City services are woefully-understaffed. There is movement to curtail-further Park facilities and services.

McQuiston believes **IFR cost-estimates are inaccurately-low**, and are nonetheless unaffordable and unfair.

Construction cost, **even if financed entirely by the United States (unlikely and unjustifiable)** will carry substantial maintenance costs. Maintenance of IFR recreational use by the United States **would clearly-be improper. The City cannot afford any of the IFR's maintenance costs. Funding local parks would be much-more important throughout the City.**

**The amount of unlawful-dumping and trespassing currently-experienced in the area is admitted in the IFR as being economically-impossible to prevent with current resources.**

Opening the channel-area to trespass will **aggravate ocean pollution, public danger**, and financial hardships.

#### **G. IFR failed to address appropriate alternatives to Options 1 & 2.**

This comment does not apply to suggested Option 3; **Option 3 is vitally-required and must be addressed.**

One must begin by defining the need for habitat, assess various locations for the habitat, and the suitability for the habitat contrasted by other considerations.

Options 1 & 2 were discussed *as if they were alternate configurations of a building to be built at one place.*

**The alternatives to constructing an optional-habitat in one place are constructing the habitat somewhere else, not alternative-configurations of habitat before factual proof justifies the location of the habitat.**

**The IFR fails to do so. It ignores existing habitats, their linkages, and their connections to the Options.**

**The failure of proving other locations don't satisfy Options' needs can't justify the IFR projects.**

Unless the existing habitats are proved deficient, the IFR **must conclude Options 1 & 2 are un-needed.**

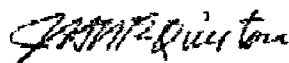
Moreover, loading a *basic public-safety* facility with construction *unrelated to public safety, while doing nothing to correct its acknowledged flaws affecting public safety, could produce a New-Orleans type of disaster.*

#### **IV. CONCLUSION**

**The projects in the IFR are not yet appropriate nor justifiable to be committed to approval.**

Issues raised in this Statement need to be addressed.

Respectfully submitted,



J. H. McQuiston

c: Interested parties



Mike Medberry  
2005 W. Heron St.  
Boise, ID 83702  
208-629-6858  
Mikecmedberry@msn.com

Kathleen Bergman  
Erin Jones  
US Army Corps of Engineers

Dear Ms Bergman and Ms Jones

Please consider my comments on the EIS to restore parts of the Los Angeles River. It is time to do this restoration and yours is a very ambitious plan indeed. It may only be 11 miles of this 52 mile intermittent arroyo that once served Los Angeles's water, but this is *in the middle of LA!*

I support the Friends of the LA river plan to increase funding from Alternative 13 to support Alternative 20. It is a large increase from a total of \$800 million to 1 billion dollars and while it is an enormous amount of money, it is the minimum amount for repairing and restoring what was originally there. And of course, nothing will really replace what was originally the Los Angeles River but it is wonderful to make the attempt to restore this river in LA. While the 11 mile stretch of the river is only a short piece of a larger FOLAR plan, I can appreciate the difficulty of bringing back this superb and high profile portion of the river. You deserve great congratulations!

Much has been done to this river over the years in the name of the people of Los Angeles, but the tenor of what people expect has changed rapidly in the last decade. Many are asking to have their river back. The city council says the same. Governor Brown reiterates that message. No one wants to have a river that is only a quick route for sewage. (I'd like there to again be steelhead...) But few want to pay for the real estate, reroute the river to its original route, move their homes, nor want to see the sorts of floods that rampaged the city in the 1880s and 1930s. So what you've come up with is a compromise, and a pretty sweet one at that. I want more sinuosity for the lower river but that may be a long, long term goal. What are your long term goals? Are they as visionary as they seem to be?

Once upon a time I was from LA. Hancock Park was a nice place to grow up—there were tangerine trees, alligator lizards, and a stunning variety of butterflies that lived in my backyard in LA. I hardly knew that there was a river, but my father told me about that river when he grew up there in the 30s and 40s and he talked about orange groves and the purely straight street that was Western. My father caught rattlesnakes in Riverside County and once bragged that he snapped their heads off in a whip-snap way. My friends captured desert tortoises and kept them as pets and I suppose that they died in the maze of LA. Of course that was all foolish. My father told a story about taking his rowboat into the La Brea Tar pits when he was a kid, but you know, what the hell, that was only a story, right? Well, we need a good story about the LA River coming back to life! And you've got a good start on that. The problem isn't money it is one of motivation,chutzpah, and a good story to tell. Well, and money... The LA River has a great

story to tell! I mean, hey--this is Hollywood! And Raymond Chandler and Joan Didion and many others to depend on.

I will support the Corps of Engineers, a group that I've long hated and opposed, as long as you keep dreaming that the LA River can be what my father once dreamed that it was. Do you want to know what he dreamed? He dreamed that it was a river.

It will be a hard, long fight, I reckon. But know that I will be on the side of restoring the river to what was. I can see the impediments that you've studied and delivered in your NEPA plan. Good job. And I ask you to grant me a two simple requests for this simple desert arroyo: more sandy bottoms and less concrete. Thank you!

Best,

Mike Medberry

**From:** [rmedford@ucla.edu](mailto:rmedford@ucla.edu)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 for the L.A. River  
**Date:** Monday, November 18, 2013 10:58:46 AM

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Dear Dr. Axt,

Thanks for hearing my comments and for all the time and efforts of the Corps and City on the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report.

I have worked at many of the river clean-up days, and now help weed etc. at Glendale Narrows Riverwalk Park. I live in the Montrose community of the City of Glendale.

I support a robust effort to restore our river to sustainability and that is Alternative 20. It is well worth the extra cost.

Sincerely,  
Roberta Medford  
2715 Sycamore Avenue  
Montrose, CA 91020

**From:** [Michelle Mehta](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for Alternative 20 of LA River Feasibility Report  
**Date:** Tuesday, October 22, 2013 4:42:32 PM

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To Dr. Josephine Axt  
Army Corps of Engineers,

I'm writing to give my support for Alternative 20 of the Los Angeles River feasibility report. It is time to restore our river to the best of our means, and Alternative 13 fails in that endeavor. I am urging you to please adopt Alternative 20.

Sincerely,  
Michelle Mehta  
Los Angeles, CA

**From:** [Marion Melchiorre](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Karin Flores](#)  
**Subject:** [EXTERNAL] Alternative 20 is The WISE Choice  
**Date:** Saturday, November 16, 2013 2:19:58 PM

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Dear USACE.Army,

For thirty years, I have lived and still live by the L.A River. I request that the Alternative #20 be used in shaping our water way. It would be worth very penny spent for the benefit of each community that the river passes through.

The cement river that was originally built is a environmental disaster.  
We need the water to go into the ground.

We want more green space to freshen our cities air.

Our communities need the river's recreational and restorative qualities that had been taken away by cementing it into a tunnel.

Pollution from our drains goes directly into the ocean.

Reconsider, change your philosophy, make us proud of our government.  
Make the wise decision for the long run, not the shortcut that leads to  
disappointments .

Alternative 20 is the wisest way to go. Our Los Angeles community is asking for what is best.

Sincerely,  
Marion Emerson Melchiorre

Marion

**From:** [Jodie Mendelson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] A statement in support of Alternative 20  
**Date:** Tuesday, October 29, 2013 4:21:03 PM

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To whom it may concern:

Alternative 20 offers the only opportunity of the various proposals to connect the LA River with the urban fabric in a meaningful way. I've kayaked on the River for the last two summers, and I can clearly see its potential to bring joy and environmental awareness to Angelenos.

Thank you for your consideration,  
Jodie Mendelson  
416 S. Spring St. #809  
Los Angeles, CA 90013



**From:** [Leila Menzies](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Select Alternative 20  
**Date:** Sunday, November 17, 2013 5:05:39 AM

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As a long-time user of the LA River as a bike-rider and nature watcher on the lower portion (Long Beach), I support alternative 20 rather than 13.

Alternative 20 brings more jobs to our City and more crucially it goes much further in terms of making the LA River actually a river again. I have spent much of my childhood and adult life being blessed to live near major and minor water-ways--the LA River as it exists now offers very limited recreational opportunities and gives no real sense of the River's historic importance to the settlement of Los Angeles.

Please bring real change to the LA River by developing alternative 20. Someday, I hope to see the lower LA River developed with as much creativity as Alternative 20 will bring to downtown LA (which has far more limited outdoor and recreational opportunities.)

Leila Menzies  
4617 E. La Vante Street  
Long Beach, CA 90815

**From:** [MICHAEL MERSOLA JR](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] La River  
**Date:** Saturday, November 16, 2013 8:40:16 PM

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Please I encourage the army corp of engineers to go with the Alternative 20 plan for the LA River. This is worth the reinvestment for the future generations of LA. Why half ass it when we can get it right the first time.

Michael Mersola Jr

818.631.5636

B.R.E License # 01503186

PLG Estates

Beverly Hills, CA 90212

[www.MersolaGroupEstates.com](http://www.MersolaGroupEstates.com)

**From:** [Ron Milam](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River: Support for Alternative 20  
**Date:** Wednesday, November 06, 2013 7:09:17 AM  
**Attachments:** twitter32.png  
facebook32.png  
linkedin32.png

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Dear Army Corps of Engineers,

I'm writing to state my enthusiastic support for Alternative 20 for the Los Angeles River. My grandfather grew up along an unpaved section of the Los Angeles River in Atwater Village in the 1930's. During his childhood, he swam and fished in the Los Angeles River, only to later watch it get paved. My father, growing up in Burbank in the 1950's, experienced the building of the 5 freeway, which further separated him from the river. By the time I was a kid growing up in the 1980's, my only interaction with the Los Angeles River was noticing the beautiful cats the artist Leo Limon painted on it as we sped by on the 5 freeway for field trips headed to the zoo. As an adult in the late 1990's, I worked to enhance access to the Los Angeles River during my tenure as Executive Director of the Los Angeles County Bicycle Coalition. Working with the city and a broad spectrum of other supportive organizations, we secured funding and the city ultimately built several new sections of the bike path along the River, which the Bike Coalition has introduced thousands of Angelenos to through the Los Angeles River Ride. Now, I'm a father with two eight-week old twin boys. Like their grandfather, I want the Los Angeles River to be an important part of their lives. The best way we as a city can do this is to fully fund and implement Alternative 20. It's the option that will create the most places for kids to play. It's the option that most reconnects our great city with its River. It's the option that will generate the most jobs. Yes, it costs a little more than the other options, but it's an investment worth making. Thanks for choosing Alternative 20.

Sincerely,  
Ron Milam  
1704 Morton Ave.  
Los Angeles, CA 90026

cc: Xavier Becerra, Jimmy Gomez, Eric Garcetti

[Ron Milam Consulting](#)  
(323) 793-0591



**From:** [Blair Miller](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Subject: Comments on Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report  
**Date:** Thursday, October 10, 2013 5:28:23 PM

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This is a once-in-a-lifetime opportunity to create major environmental and economic benefits in multiple Los Angeles neighborhoods. This is the time to Dream Big! Please select Alternative 20.

**From:** [mmills8935@aol.com](mailto:mmills8935@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 6:44:48 AM

---

Dear Sirs:

I support Alternative 20 for the LA River because I want to remove as much concrete as possible and it is a far more comprehensive plan.

Cordially,  
Melissa Mills  
2187 Alexdale Lane  
Rowland Heights, CA 91748

**From:** [Gerald Mischke](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support Alternative 20  
**Date:** Sunday, November 17, 2013 7:14:39 PM

---

Hello,

I think we need to think big and that is why I support Alternative 20.  
Los Angeles is a great city and it needs a great river.

Thank you,

Gerry Mischke  
1412 Gordon St, Los Angeles, CA 90028



From: andrew montealegre [<mailto:montana.alegre@yahoo.com>]  
Sent: Thursday, September 19, 2013 4:00 PM  
To: Jones, Erin L SPL  
Subject: Support for Alternative 20 -- LA River

I would like to voice my support for Alternative 20 of the LA River Feasibility Study.

As a retired planner from the City of Los Angeles we first did a report around 1989 on the feasibility. That report also had a picture of me in a canoe on the river.

It's a long time.

Andrew Montealegre  
Chair, Glassell Park Neighborhood Council Economic Development and Land Use Committee

Casa de la Montaña Alegre  
3854 Cazador Street  
Los Angeles, CA 90065  
[montana.alegre@yahoo.com](mailto:montana.alegre@yahoo.com)  
cell 323-317-2966 land line /fax 323-474-6416  
website: [urbanplanningstudios.com](http://urbanplanningstudios.com)

**From:** [Ashley Morales](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] To whom this may concern...  
**Date:** Monday, November 18, 2013 2:05:28 PM

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As a resident of the Los Angeles County, I strongly encourage the US Army Corps of Engineer to choose Alternative 20 for the Los Angeles River Ecosystem restoration Project. We need to solve our degraded urban watershed. Thank you.

With respect, Ashley

Sent from my iPod

**From:** [Pat Morton](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Study  
**Date:** Saturday, October 12, 2013 1:26:31 PM

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As a resident of Atwater Village next to the LA River, I applaud your choice of Alternative 13 for the restoration of habitat and creation of more public use of the LA River. Your decision to prioritize habitat restoration over recreational uses of the River is exactly right.

The LA River is essential wildlife habitat. Using it for more intensive recreational uses will displace wildlife that have no alternative habitat, a truly awful choice given the degraded state of our wetlands and waterways.

The idea of terraced banks to give humans access to the River is not a good one. The current seasonal use of part of the River for small craft is ridiculous and should be stopped.

Restore as much of the River as you can, but keep it for the wildlife, not the humans. Stay with Alternative 13.

Patricia Morton  
4400 Brunswick Ave  
Los Angeles, CA 90039

**From:** [Harlan and Virginia Moyer](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@foliar.org](mailto:contact@foliar.org)  
**Subject:** [EXTERNAL] LA River Ecosystem - Approve Alternative 20  
**Date:** Saturday, November 16, 2013 1:57:35 PM

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My husband and I, Harlan and Virginia Moyer, have been residents of Mount Washington for 20 years. We frequently walk along the river and have marveled at how nature is willing out – with lush growth of trees and other plants, lots of birds and water fowl. We love the Los Angeles River and think it is time for it to be a real river again.

It is apparent from the endorsements across many diverse communities that Alternative 20 is the best choice for the Los Angeles River.

We appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. We are thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! We have reviewed the report in detail and are writing to voice our support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Please join all the groups who have endorsed Alternative 20 and make this the choice for making our river thrive.

Regards,

Harlan & Virginia Moyer  
957 Nordica Dr  
LA 90065

**From:** [Kalisa Myers](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] The LA river- our water, our security  
**Date:** Monday, November 18, 2013 10:05:04 PM

---

Dear Dr. Axt:

My name is Kalisa Myers, a research scientist at USC. I first learned of the LA river when I realized the USC shuttle drove right over it; I only knew it was a river because of the sign saying so. If that sign had not been there I would have assumed it was a massive ditch made only for the filth of LA to flow down. Won't you consider making this an eco-resort, with lots of well-paying tourists paying for expensive bike rentals and \$20 Hot Dog Sticks, like we have at Santa Monica? Instead of the Super Spot where my friend's dog got MRSA from accidentally falling in? (True. She has records and he still has toe-weirdness!) Instead of the Spot I'm scared to go in- not just because if I fell in, I might die of MRSA, but because my rotting body would not change the overall odor of the place and my corpsified self is never found.

I'm a microbiologist, folks. And I will offer my entire inheritance to the first engineer who will swim in the LA river for 10 minutes during the first heavy rains. No takers? Why not?.. Hmmmm.....

Yeah, I wouldn't take it either. You couldn't pay me enough to swim in the LA River. Is that really what we want for our own watershed? Why not make it a clean watershed and sit back like Kings, as we watch tourists from all over the world come to it. As time goes by, it will only get more valuable as more watersheds get destroyed. Look at Santa Monica. What earned us more- Hyperion allowed to dump sewage galore, or deciding, no, we'll make that a tourist beach. Over time, the tourists have made it worth it. They have turned Santa Monica into a cash cow. Why not get a piece here? We have a whole gorgeous river. Let's love her and watch her pay us back bigtime!

From FOLAR -

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people

- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely, Kalisa Myers and FOLAR



November 17, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

<comments.lariverstudy@usace.army.mil>

Dear Dr. Axt:

I'm Tom Nachtrab. I live in a distant part of the City of Los Angeles called Chatsworth. A tributary of the LA River drains the Simi Hills and runs, at times and between concrete walls, through my neighborhood.

I, without reservation, urge the USACE to step up and make maximum use of the rare opportunity we now have to make significant improvements in the quality of life for some of LA's flora and fauna (human and all the rest).

Please submit ALTERNATIVE 20 to Congress for approval. We do not want to pay (less) for a token improvement.

We need robust improvements to the LA River corridor, so we need to pay the price, as an investment in a healthier future.

Please don't let us squander this chance. Please revise your TSP to #20 RIVER.

Sincerely,



Thomas A. Nachtrab  
10530 Larwin Ave. unit 7  
Chatsworth, CA 91311-0352  
tnachtrab@gmail.com

**From:** [David Nemtzow](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alternative 20 on the LA River  
**Date:** Monday, November 18, 2013 2:34:35 PM  
**Importance:** High

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Dear Dr. Axt:

I am a resident of Santa Monica and a frequent user of the Los Angeles River and its surroundings for bike riding and even a wonderful kayaking trip during one of the allowed kayak trips.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am very pleased that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration. I have reviewed the report and I am providing comments **in support of Alternative 20** presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, **Alternative 13 lacks the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.**

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in LA, the US's 2nd largest city

Alternative 20 is far superior to Alternative 13 for many reasons that have been well articulated by the Friends of the LA River (and I support their work on this issue), particularly as it would better improve the River (in both quality and quantity) and make the River more similar to the ecosystem that historically existed prior to the channel.

Restoration of the LA River is crucial to me and the region. The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. I respectfully urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Please let me know how the issue develops and thanks in advance for considering my views.

Sincerely,

David Nemtzow  
1254 9th Street  
Santa Monica, CA 90401  
310-622-2981

=====

**David Nemtzow**  
[david@nemtzw.com](mailto:david@nemtzw.com)

**From:** [Carol Ng](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Choice  
**Date:** Saturday, November 02, 2013 11:01:38 PM

---

I want to express my support for Option 20. I feel that although this is the costliest choice, it can be completed and funded in stages. I feel it best accomplishes the goal of cleaning the River, and consequently, the runoff to the Pacific. Moreover, it will protect and enhance the surrounding flora and fauna. It will provide a game-changing scenic focus for our City.

Thank you for your consideration.

**From:** [Sonia Nicholson](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Thursday, October 17, 2013 7:27:30 AM

---

Dear Army Corps of Engineers:

Please adopt alternative 20 as the best course of action for the Los Angeles River and the Angelenos of the present and future. Alternative would provide recreation, habitat improvements, and stormwater management at the same time. This is an enormous opportunity to create a better city that will improve the lives of humans and wildlife that should not be missed.

Sincerely,  
Sonia Nicholson  
Architect  
Landscape Architect

From: Frank <frank@hwedc.com>  
Date: Thu, Oct 17, 2013 at 9:39 PM  
Subject: LAR Notes  
To: michael.affeldt@lacity.org

here is a PDF of my notes. notion is to get key ACE decision metrics of Alternative 20 > Alternative 13.

this isnt via smoke / mirrors etc but by really scrubbing the numbers and making sure all the benefits are identified and quantified.

also, i'm assuming the costs are accurate or if not that any variations would occur across all the alternatives. this may be incorrect.

i'm happy to talk further at your convenience.

obviously there will also be a persuasion process w city and federal officials. better and more accurate data would help this.

thanks for the work on the river project. it's very important.

regards  
frank o'brien  
///

COMMENTS on ACE LAR PLAN 101713

Comments focus on Alternatives analysis.

A. Need to Consider Watershed as Inter-Connected Total Natural System.

Compton Creek is omitted as an LAR tributary. Figure 3-1 and narrative at page 61. Historical Dominquez riparian areas not accurate. Figure ES-1. Rely on secondary sources rather than original sources.

Why is this important?

- Downriver is affected by what happens upriver
- Natural Resources and Water Quality in tidal prism and San Pedro Bay.directly
- City of Compton & LA Watts portions, Central Ave – 103<sup>rd</sup> St – Watts Towers. indirectly

Alternative analysis should include a tabulation of not just “footprint” area but entire watershed benefits.

NOTE: Downrange Congresspeople not on distribution.

B. CE / ICA. Cost Effectiveness and Incremental Cost Analysis

Alternatives Not “Self-Contained and Policy Neutral” : Different alternatives generate different levels of learning, technical expertise and example modeling. Upper watershed projects have benefits elsewhere regionally, in the nation and internationally.

LA River Aesthetics enlarge the sense of the possible. Individually and shared futures.

These features can be Translated into a Quantity Value for the Alternative Analysis.

Notion of Incremental Dollar. Accurately evaluate alternatives Marginal Dollar allocated back to all prior dollars to capture benefit of infrastructure investment.

- Ie Green Line Trolley to LAX

C. TOO AMBITIOUS / TOO EXPENSIVE. TOO MODEST.

- “Cultural Literacy” includes Sense of Wild Nature, A Past that isn’t past, Alternative Futures and Textures of Life.
- For example, does not include restoration of Chavez Ravine to prior condition. ///



**ROUGH BACK OF ENVELOPE CALCS**

Reference Table 4-10; not changing any costs

Net Average AHO for Alt 20 from \$6,782 to \$8,225

Incremental Unit Cost Alt 20 \$7,750 v \$7,900 for Alt 13.

Result: Alt 20 : Not As Locally Preferred but NER Plan.

6

7

**SUMMARY RECOMMENDATIONS:**

- Original sources not secondary sources
- Comprehensive analysis to include total watershed benefits within Net Average AHO.
- To degree permissible within CE / ICA model include all benefits including public policy and aesthetic benefits that are real although difficult to quantify.

8

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**From:** [Beverly Ocas](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 1:57:56 PM

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I strongly suggest, in regards to the LA river restoration program, that you choose Alternative 20.  
-Beverly

Sent from my iPhone

**From:** [olson@lafn.org](mailto:olson@lafn.org)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Save the Water  
**Date:** Wednesday, October 09, 2013 11:24:39 AM

---

Dear Sir:

2/3 of the water in LA River flows out to ocean and is thus wasted. Check dams and settling basins would be great to save this valuable resource for all Angelenos. Hansen Dam has successful settling basins. This could save LA hundreds of millions of dollars for water it no longer would need to purchase.

Carl Olson  
P. O. Box 6102  
Woodland Hills, CA 91365  
818-223-8080

-----  
This message was sent using Endymion MailMan.  
<http://www.endymion.com/products/mailman/>

**From:** [Eraina Olson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support the LA River Protect  
**Date:** Thursday, October 17, 2013 10:53:56 AM  
**Attachments:** image003.png

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I support the LA River Project. LA needs more urban, green open spaces especially river recreational areas close to inner cities, instead of ugly, concrete, empty riverbeds which are extremely unsightly and of no use to anyone (with the exception of controlling flooding). Therefore I support the "Alternate 20" for LA River future.



*Eraina Olson  
Underwriting Administration  
1700 Greenbrair Lane  
Brea, CA 92821  
714 255 5002  
Fax 714 255 5096  
[eolson@mercuryinsurance.com](mailto:eolson@mercuryinsurance.com)*

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**From:** [william o'neill](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@fojar.org](mailto:contact@fojar.org)  
**Subject:** [EXTERNAL] ALTERNATIVE 20, we strongly endorse this more comprehensive plan.  
**Date:** Saturday, November 16, 2013 10:09:33 AM

---

Hello.

ALTERNATIVE 20, we strongly endorse this more comprehensive plan.

In the **Los Angeles River Ecosystem Restoration Integrated Feasibility Report**, the U.S. Army Corps of Engineers chose Alternative 13 as their Tentatively Selected Plan.

FoLAR and a large coalition of elected officials and environmental groups agree that this plan **FAILS TO CONSIDER** key factors of our unique environment and **FALLS FAR SHORT** of achieving meaningful transformation in our degraded urban watershed.

Instead, we strongly endorse the more comprehensive **ALTERNATIVE 20**.

There is still time to influence this decision. Let's seize this opportunity to remove more concrete, create more habitat, connect important corridors, and conserve more open space for the health of the wildlife and people of Los Angeles.

Thank you.

William O'Neill

Friday, November 15<sup>th</sup>, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division

U.S. Army Corps of Engineers, Los Angeles District

P.O. Box 532711

ATTN: Ms Erin Jones, CESPL-PD-RN

Los Angeles, CA 90053-2325

[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

My name is Ben Oswald, owner/operator of PlantNativePlants, and a nearby resident of the Los Angeles River for over 20 years. Native California ecosystems are very important to me personally and professionally, and it is of critical importance to me in these respects, as well as on a global scale, for people to understand and appreciate the value of Native, natural ecosystems. This appreciation and knowledge will lead us to become better global citizens, and I believe there is no better opportunity to do so in my large, under-parked area of Eastern Los Angeles, than restoring the LA River to it's most full and most natural state.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate, including scores of endemic species.
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

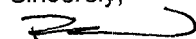
- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains



- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
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- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
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- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,



Ben Oswald  
4223 Portola Ave.  
Los Angeles, CA 90032

**From:** [Harry Otto](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River study alternatives  
**Date:** Sunday, September 29, 2013 8:10:35 AM

---

Please indicate my support for Alternative -20 for the revitalization of the Los Angeles River.

Thank you,  
Harry Otto

Sent from my iPad

**From:** [S. David Padilla \(dP3\)](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Letter in support for the Los Angeles River Restoration  
**Date:** Monday, November 04, 2013 1:33:53 PM

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Good morning,

Over the past few years, Angelenos, like myself, have come to realize that many decisions taken during the last century have lead Los Angeles to grow in a way that is not sustainable. Much of our water that would normally be absorbed into the water table has been carried out into the ocean, carrying whatever substances it picked up along the way with it. When touring the city with friends from out-of-town, they laugh at the idea of Los Angeles having forests, let alone a river. However, as we drive through Griffith Park, next to the 134 and down the 110 Parkway, they come to realize that Los Angeles isn't just the textbook definition of urban sprawl, but that some wilderness was left behind. As we dig deeper to the history of the city, it becomes clearer that the Los Angeles we know only came about around 1930. Earlier pictures show open spaces and pastures, earlier articles talk about building bikeways from Pasadena to Downtown, and some tell stories of unusual snow on the ground.

Projects such as the LA river restoration don't come by often and they are at the whim of the political climate, funding, and taxpayer attitude. The timing for this project to be completed is not at its prime, but it is as good as one could wish. The city is revitalizing itself and creating new initiatives to combat decades of myopic planning, creating a rare opportunity to revert developed land into its original state. Although people need space to grow, it cannot be done in spite of the ecosystem around us--greenscapes that help the city breathe and purify our air, open land that help filter the water before it can pollute our beaches were we swim, reduced impermeable surfaces to mitigate the heat island effect, and breaks in urbanized space to create opportunities for businesses to prosper and stand out. In cities where space is limited, such as New York, the most desirable land is where city meets nature, where dwellers can seamlessly travel from the city to a forest and effortlessly return again--all without leaving city boundaries.

Many studies have equated tree cover to income levels across the United States, some as far as Washington D.C., but we don't need to go so far to see this, when it is obvious in our own communities in Southern California. Access to clean air and open space should not be a luxury, but rather a benefit for everyone to use. Many of the areas affected by the LA River project are adjacent to working-class neighborhoods or in spaces that will be used by the entire spectrum of Angelenos--spaces such as the Cornfield, which serves as an event space for all ages. Taylor Yard is adjacent to Mount Washington, Highland Park, and Garvanza, which have all been historically of modest income. By increasing the natural space available to residents, the value of their land will increase and will have nearby access to prime open areas, rather than disused train yards.

Conversely, areas such as Downtown LA are in the middle of booming growth that has proven to create a community that is diverse and vivacious. However, this growth will continue to push outward as it always does, it is then crucial to secure open-space areas now, while financial pressure is lower, rather than in 10 years when such a project would be deemed financially impossible. We can look to Griffith Park as a case study, had this space not been protected for future generations, it

would be covered completely in exclusive mansions of various sizes, rather serving the city as a whole, while maintaining the feeling of the community around it. To re-create it today would take a gargantuan effort and a litany of problems.

For all these reasons, I support a complete and thorough plan encompassed in Alternative 20.

Thank you for helping Los Angeles evolve.

Sincerely,

--

S. David Padilla

**From:** [Robin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA RIVER PLAN  
**Date:** Thursday, October 10, 2013 5:04:27 PM

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To whom it may concern,

I appreciate your availability to comments from locals. Please accept this email as a message of representation regarding the recent voting on the rehabilitation of the LA RIVER. I am in full support of the plan to make this flowing heart of our city as welcoming and healthy as possible for all its inhabitants. I encourage the powers that be to choose a financial plan that recognizes how important the River program is to the city, instead of the cheapest option.

Thank you for your time and stewardship.

Robin Paravecchio

**From:** [Fly PR](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] WRITING IN SUPPORT OF ALTERNATIVE 20  
**Date:** Friday, October 11, 2013 9:49:20 PM

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Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, CA 90053-2325

Dear Josephine R. Axt, Ph.D,

I would like to express my full support for L.A. River transformation referred to as ALTERNATIVE 20. Los Angeles is an amazing city and the potential to offer the people that live here this kind of green space has seldom been possible.

We need this transformation of the Los Angeles River to move L.A. to the next stage of development as a liveable city, gorgeous city.

I hope you'll decide to make ALTERNATIVE 20 a reality.

Sincerely,

Ilka Erren Pardinas  
home owner in Glassell Park  
proud citizen of Los Angeles

Fly PR  
2658 Griffith Park Blvd., № 816  
Los Angeles, CA 90039  
T. 323-667-1344  
[flypr@flypr.net](mailto:flypr@flypr.net)  
<http://www.flypr.net/>

"Imagination is more important than knowledge, since knowledge is limited."  
- Albert Einstein

**From:** [Daniel Paredes](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Revitalization  
**Date:** Monday, November 18, 2013 9:19:07 PM

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To Whom It May Concern,

When my grandparents first moved to Elysian Valley more than 40 years ago, they never imagined that their daughter would later return to the same neighborhood, meet my father, a man from the same small town in Mexico who she had never met, and raise a family of four.

My parents still live in Elysian Valley, and I returned for graduate school at UCLA after finishing my studies in UC Berkeley. Now, with a degree in Political Science, in Sociology, a minor and Masters in Urban Planning, I feel that my community, and those that surround the LA River, are in dire need of local jobs.

I support Alternative 20 for my city, but I also support local hiring for the work that is to be done in our neighborhoods. For the sake of our futures and the future of out youth, please include Local Hire provisions in Alternative 20.

Thank you.

Daniel Paredes, Research and Policy Analyst

LAANE



**From:** [Andrew B. Parke](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] The Army Corps should choose "Alternative 20" as the best plan for the LA River's future.  
**Date:** Thursday, October 17, 2013 8:45:23 AM

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The Army Corps of Engineers should choose "Alternative 20" as the best plan for the Los Angeles River's future.

--

Andrew Parke, S.O.C.  
[andrewBparke@gmail.com](mailto:andrewBparke@gmail.com)

**From:** [Richard Pearce](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Monday, November 18, 2013 10:32:31 AM

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Nov 18, 2013

Richard Pearce  
240 Bentley Circle  
Los Angeles, CA

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

My name is Richard Pearce. I am a film-maker who has lived in LA for over 35 years. I have taken a kayak trip with George Wolf on the LA River and as a result feel passionately concerned about its preservation and future development.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river

connections, rather than just culverts or pipes

- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,  
Richard Pearce

**From:** [Karen Pedersen](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Study comment  
**Date:** Thursday, October 17, 2013 2:55:47 PM

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Dear Engineers:

Thank you for providing opportunity for public comment. I live in the Mt. Washington neighborhood of Los Angeles, and have lived here for 35 years. I support the Alternative 20 plan as the most expansive, transformative and beneficial option. It will provide maximum habitat for wildlife, create the richest and most diverse opportunities for residents' and visitors' appreciation of the river area, and generally the best enhancement of a long-neglected part of Los Angeles ecological and cultural heritage.

Thank you.

Karen Pedersen  
Elyria Drive  
Los Angeles, CA 90065

**From:** [Gladys...](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Restoration Project  
**Date:** Monday, November 18, 2013 2:01:25 PM

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To whom it may concern,

I am writing to ask you, The US Army Corps of Engineers, to please reconsider the decision on the Los Angeles River Restoration Project. I believe it would be best to choose Alternative 20 on the project because it would be the best choice for the pollution problem on the ocean.

Thank you,  
Gladys Perez

**From:** [sue.petteway](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Alt 20  
**Date:** Tuesday, November 12, 2013 11:31:02 AM

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I strongly support Alt 20 for reclaiming our river. As a Chinatown resident, I look forward to re-integrating my neighborhood with a restored LA River, honoring the City's fundamental relationship with the River and enjoying the resurgence of wildlife Alt 20 will bring.

Thank you,  
Susan Petteway  
808 N Spring St # 616  
Los Angeles, CA 90012

**From:** [Marjorie Phan](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments for the LA River's Alternative 20  
**Date:** Monday, October 21, 2013 8:52:26 PM

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Hello,

I am a committed discretionary public transit user, hoping to minimize my carbon footprint, save money and support the movement towards a more sustainable urban life. I own a car, but I choose to use buses or trains to travel within the LA County for work, errands and fun activities almost every day.

During my free time, I enjoy venturing to Southern California's Great Outdoors (National Forests, urban rivers, city parks, beaches or lakes) to decompress and explore, but these places are almost never accessible by public transit, so I have to drive and struggled through gridlock traffic and stand up to rude drivers. My enjoyment of nature ironically generates pollution to our air, water and soil and also burn a hole in my wallet. However, I am aware that many people can not afford to enjoy Southern California's Great Outdoors even if they want to because a car, any car, is not affordable and the scant public transit options to trails, forests, nature centers are slow, time consuming and confusing.

My wish for the new LA River is to involve local and regional transportation planning authorities near the area to establish cost effective, efficient and reliable public transit options for patrons of the LA River from every direction and from every socioeconomic background. Please include a spatial layout of current transit routes that bring people to or close to the LA River and include potential new and improved routes. It would be great if existing walking and biking paths are improved upon to be better connected to public transit options to make traveling to, from and within the River easy and painless.

Thank You.



**From:** [Grace Phillips](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA RIVER: I WANT ALT. 20!!  
**Date:** Tuesday, October 01, 2013 7:36:27 PM

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PLEASE give us Alternative 20 for the LA River!! Army Corps of Engineers could be the hero for every single person in Los Angeles, or you can look like a stingy meany. After scraping everything up at the Sepulveda Basin, ACE needs to prove to the citizens of LA that it actually gives a hoot about us! My kids love the river and want to see it come to life. Please pursue ALTERNATIVE 20!!

Thanks,  
Grace Phillips  
Santa Monica, CA

**From:** [Shane Phillips](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alternative 20  
**Date:** Wednesday, October 02, 2013 12:52:58 AM

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To whom it may concern,

I'm writing to put my support behind Alternative 20 for the restoration of the LA River. While I believe the restoration of the river is crucially important, I see this as more than just an environmental project. It is also an outstanding opportunity for economic development, the chance to build a premier cultural landmark, an entertainment and recreation hotspot, and a way for Angelenos to be more active in a beautiful, inviting, and safe environment.

Even beyond that I believe this can be a project representative of the restoration of Los Angeles itself. Along with the expansion of the light rail system and the revitalization of downtown and other neighborhoods, this is a way for us to build a more sustainable city--one that is built for people, not just cars. Alternative 20 will reinforce that vision and contribute most to making it a reality.

I understand that the cost of Alternative 20 is exceptional, but I am confident that it is well worth the expenditure. The diversity and magnitude of benefits are justification in their own right, and I am confident that in the long run this will be a positive financial investment as well--an outstanding project will draw tourism and growth in the coming generations that will surely be sufficient to offset the additional costs of this most ambitious proposal.

Thank you for taking seriously the concerns and input of the public, and particularly those who are excited to take best advantage of this resource for themselves in the coming years.

Best,

Shane Phillips  
(425) 780-0738

# M

Piane
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14 November 2013

Josephine R.Axt, Ph.D.; Chief, Planning Division  
U.S.Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Attn: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, California 90053-2325

Dear Dr.Axt:

I am a long-time resident of the Northeast Los Angeles community, Glassell Park. Much of my neighborhood's southwest border is defined by the Los Angeles River. During the time I've lived here, the Los Angeles River hasn't changed much, but, with only minimal improvements--a park here, a path there, some artistic gates--my fellow Angelenos's perception of it certainly has. The River is no longer an obstacle to be circumvented on our way out of the neighborhood; it is now a vital part of our landscape and a reason--in an area historically short of them--to celebrate our community.

If such a change of awareness can occur with comparatively minor improvements, imagine what a full restoration of the River would do for our region!

I am grateful for the time and effort you and your staff put forth to carry out your study and to prepare such a thorough report. I read it with great appreciation and enthusiasm, and attended your presentation at the River Center as well. Thank you for involving the community and providing this opportunity for comment.

I believe that rivers are truly the life-blood of cities, and that it is an imperative of this generation to restore our River to the fullest extent possible. It is for that reason that I implore you to recommend Alternative 20 as the only plan that will provide the level of connectivity that is essential to effect a comprehensive and sustainable restoration.

Once again, thank you for all your efforts on behalf of our River and the people and wildlife it benefits. I ask you to please reconsider your initial recommendation, and recognize that only Alternative 20 can truly create a River for our future.

Sincerely,



Marge Piane

**From:** [Antonio Pierola](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for LA River Alternative 20  
**Date:** Wednesday, October 30, 2013 10:57:43 AM

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The selection of the most appropriate alternative for the revitalization of the Los Angeles River should rest on the benefits to the connection of riparian habitats that enhance the lives of the residents closest to its watershed.

LA took a major step forward when portions of the LA River were allowed to look like a river and no longer a concrete channel. Nevertheless, there are communities in the vicinity that still have no tangible connection to the natural habitats that a healthy river would nourish.

It would be a shame that, having the opportunity, after years of waiting for a greater inclusion of this revitalization, Downtown Los Angeles, Glendale, and the NE Los Angeles communities remain left out.

Alternative 20 includes key portions of the watershed in the revitalization project. Alt 20 is the most appropriate way to realize the hopes for connectivity with existing revitalized corridors within the LA River as well as with its tributaries, like the Arroyo Seco and Verdugo 'confluences.'

The quality of life for children, the active retired, the enhanced economic values in the surroundings, access for green educational opportunities, and the stimulus for flora and fauna diversity are worth every effort to achieve an integrated revitalization.

Let's not leave this for the future. The time is now to provide the connection between urban living and our natural habitat for our children and theirs.

My choice is Alternative 20. Please listen to my voice and those of my fellow watershed residents from Altadena to Downtown and up beyond Glendale.

Thank you.

Antonio Pierola  
626.627.9017

**From:** [Anthony Plamondon](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Monday, November 18, 2013 2:05:03 PM

---

I support option 20 for real change to the LA River. Please reconsider.

Anthony Plamondon  
3733 Rolle St  
Los Angeles, CA 90031  
213 618 6175

**From:** [Mikaela Pollock](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] Please Choose Alternative 20  
**Date:** Monday, November 18, 2013 9:38:32 AM

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Dear Dr. Axt:

My name is Mikaela Pollock and I'm a new resident of Elysian Valley. I've lived in the neighborhood for almost two years but have visited the river and its bike paths for much longer. My family and friends frequently (1-3x per day) utilize the space for recreation- biking, walking, dog-walking, running, kayaking, photography, etc. And it was our love of the river and the spaces surrounding, that called us to move into the area. Though I work at The Getty, all the way across Los Angeles, the commute is worth coming home, back to the river. I can't believe how lucky Los Angeles is, that among the ridiculous traffic and endless concrete sprawl, we have such an incredible natural resource just waiting for revitalization!

Thank you for your time and effort working with the community for the benefit of the river. I have reviewed the report and urge you to support Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, this alternative lacks the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Alternative 20 is far superior to Alternative 13 for a number of reasons including: providing for additionally restored habitat, more concrete removal, wildlife connectivity affecting migration, sustainability, job creation, etc. Alternative 20 would provide the amount of space needed to bring Angelenos together to enjoy wholesome outdoor activities and exercise.

Living on one of the more popular streets for river access, I watch families access the path almost every single day. They bring with them children that would otherwise never see a blue heron, egrets, and other wildlife in its habitat. Children that would otherwise likely be watching tv or inside playing video games are getting exercise together with their families outdoors. It's a fantastic site and we need to ensure that this step in the revitalization effort is great enough to sustain this movement.

I urge the Corps and City to select Alternative 20 because it provides the best restoration and is the most sustainable option.

Sincerely,

Mikaela Pollock

November 17, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

My name is Larry Pryor and I am an associate professor at the Annenberg School for Communication and Journalism at the University of Southern California. I wish to urge the adoption of Alternative 20 for many reasons, but on behalf of the many young people who have become familiar with the river and its immense possibilities..

Many of us who teach in Southern California, from grade school to graduate school, use the Los Angeles River as our laboratory. Its urban setting and the heroic efforts that have been made over the years by Friends of the River and its supporters offer an ideal context to demonstrate that environmental restoration can succeed. The unique partnership that has been forged between concerned citizens and the local, state and federal government serves as a model for our students to study. They not only absorb this lesson from studying documents but also through interviews and visits to the river to see the setting first-hand.

I teach a course in Environmental Journalism at USC and not only spend several class hours on the history and promise of the Los Angeles River but also a day on the river, using a USC bus to transport the class. We visit key parts of the river, plus the FOLAR office, where Lewis McAdams spends time giving the students his views on the importance of restoration of the river to the community. The students are then required to write news stories based on their experience.

This valuable resource had been all-but abandoned, but we now have the opportunity to turn it into a vital part of the local environment. We may not have a chance to accomplish this later as Southern California continues to build out. Alternative 20 offers the most long-term benefits. I hope the many young people and students who have been, and continue to be, exposed to the river's possibilities will have their faith in government boosted by seeing Alternative 20 selected.

Sincerely,

Larry Pryor  
Associate Professor  
University of Southern California  
University Park  
Los Angeles, Calif. 90089



**From:** [Dorrit Ragosine](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. River - Alternative 20  
**Date:** Wednesday, October 09, 2013 12:27:15 PM

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Dear Army Corps of Engineers,

As a resident of Los Angeles who lives near the river, I would like to submit my vote for the Alternative 20 option. Los Angeles is in desperate need of green space and an artery for bicycle traffic.

Although Alternative 20 is more expensive, it is a wise, long term investment in the future of our city.

Please consider changing your stance.

Best,

Dorrit Ragosine  
Social Change Public Relations & Marketing  
213-509-7748  
[dorrit@socialchangepr.com](mailto:dorrit@socialchangepr.com)  
Visit us on the web at: [www.socialchangepr.com](http://www.socialchangepr.com)



**From:** [abir rahman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River  
**Date:** Monday, November 18, 2013 1:59:28 PM

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To whom it may concern,  
Please choose Alternative 20 for the Los Angeles River Ecosystem Restoration Project. As a student who is concerned about the environment, I believe Alternative 20 is the more efficient plan as opposed to Alternative 13.

Thank you,

Abir Rahman  
Student at John Marshall High School

**From:** [William Ramseyer](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Project  
**Date:** Monday, October 28, 2013 2:36:15 PM

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After careful consideration I feel Alternative 20 best meets the needs of Los Angeles.  
William Ramseyer

**From:** [Jae Rand](#)  
**To:** [Jones, Erin L SPL](#)  
**Subject:** [EXTERNAL] LA RIVER OPEN COMMENT PERIOD  
**Date:** Thursday, October 17, 2013 9:06:21 AM

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Hi Erin,

I'm writing to add my vote for making the project #20. If we are going to spend the time and every ones money, it should be the most inclusive of possibilities. There are a lot of people living in and out of the area that could benefit from using the revitalized river.

Sincerely,

Jae Moreno Rand  
860 N. Ave 65  
Los Angeles, CA 90042

ATTN: Ms. Erin Jones, CESPL-PD-RN  
Josephine R. Axt, Ph.D., Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District,  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Ms. Jones,

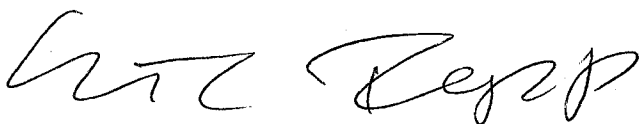
Regarding the Los Angeles River Ecosystem Restoration Project:

I grew up on the southwestern edge of Glendale, less than half a mile from the Los Angeles River. I can't imagine how much it would have enhanced my childhood to have had the LA River be not a dangerous, fenced-off barrier between us and Griffith Park, but instead somewhere we could have played and enjoyed a bit of nature.

This is especially true in that area (and most of the residential areas near the LA River) where sometimes the only greenery is whatever manages to grow between the cracks in the pavement. Restoring some of the natural ecosystem to what is often a blighted urban landscape would be an incredible blessing for this area and Los Angeles as a whole.

For these and other reasons, **I fully support Alternative 20**. I believe it would restore the maximum amount of ecosystem and bring the greatest benefit to the Los Angeles River.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Eric Rapp", written in a cursive style.

Eric Rapp  
333 N. Windsor Blvd.  
Los Angeles, CA 90004  
Eric\_rapp@hotmail.com

**From:** [Inah Raquedan](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL]  
**Date:** Monday, November 18, 2013 2:00:58 PM

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To Whom It May Concern :

Please choose Alternative 20 because as a resident of Los Angeles County I care about my environment . Rather than fixing a part of it might as well fix the whole system .

Josephine R. Axt, Ph.D.; Chief, Planning Division  
P.O. Box 532711  
ATTN: Ms. Erin Jones, CESPL-PD-RN  
Los Angeles, CA 90053-2325  
[Cc/comments.lariverstudy@usace.army.mil](mailto:Cc/comments.lariverstudy@usace.army.mil)

11/16/2013

Dear Dr. Axt:

My name is Mary Renaker and I have been an urban creeks and riparian parkways supporter since 1989. I co-founded the Cottonwood Creek Conservancy in Encinitas, CA, and along with the City of Encinitas, County of San Diego and State of California, successfully restored an historic creek, permanently removed 130,000 stalks of invasive *Arundo donax* in the riparian zone, established the creek as a CA State Point of Historical Interest on Pacific Coast Hwy., and with San Diego People For Trees, established a wildlife corridor between Batiquitos Lagoon and Cottonwood Creek along Historic Hwy. 101 in Encinitas.

I have been a supporter of Friends of the Los Angeles River since that time, and identify with the organization's mission to create a better balance of our environment and urban community along our remaining riparian corridors in Southern California.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report.

I have reviewed the report and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative lacks key areas essential for adequate ecosystem restoration of the Los Angeles River.

My major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot, including mountain lions, mule deer, coyotes and bobcats
- The rarity of the region's Mediterranean climate
- The intense destruction of natural areas and overdevelopment in the 2nd largest U.S. City



**Alternative 20 is far superior to Alternative 13 for the following reasons:**

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly

**The Regional Economic Development analysis shows Alternative 20:**

- Provides 7015 more jobs and \$386 million more in wages during construction
- Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
- Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial for buffering the effects of climate change and for the health of future generations!

The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. I urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Thank You Sincerely,

Mary Renaker

1237 ¼ - 18<sup>th</sup> St.

Santa Monica, CA 90404

(310) 264-9179

**From:** [Elaine Rene-Weissman](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org); [melissa.guerrero@mrca.ca.gov](mailto:melissa.guerrero@mrca.ca.gov)  
**Subject:** [EXTERNAL] ARBOR Reach proposals  
**Date:** Sunday, September 29, 2013 11:43:51 AM

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As an architect practicing in the Los Angeles area for twenty years, I have seen the evolving recognition of the Los Angeles River as an powerful 'green and blue' resource. I support Alternative 20. It will revitalize the de-stimulated neighborhoods adjacent to the waterway. It will improve the ecological conditions of a great river, and it is the right expenditure of government resources.

I am concerned that there has been insufficient recognition of the historically significant bridges and viaducts serving the LA River. I believe they constitute a historic district, and any new bridge construction should, at the very least, aspire to be as elegant and noteworthy as the ones already built.

Thank you,

Elaine René-Weissman, Architect + LEED AP  
ERW DESIGN  
6624 Dume Drive  
Malibu, CA 90265  
310 457 1809 t  
[www.erwdesign.com](http://www.erwdesign.com)

**From:** [Elaine](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Friday, November 15, 2013 8:49:15 PM

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LA is one of the most important - and largest- American cities. It deserves full federal support to revitalize the LA River.

Sustainable strategies are needed.

Don't hold back. Spend the money. We will all be rewarded.

Elaine  
ERW DESIGN  
310 457 1809

**From:** [Cheryl Revkin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please consider Alternative 20 for our river  
**Date:** Saturday, November 16, 2013 8:43:35 AM

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To Whom it May Concern

After reading the various proposed improvements to our Los Angeles River, I hope you will consider Alternative 20 which takes into account a long range plan to restore the river and it's surrounding environment. Clearly this would benefit out city as a whole and the various communities along the river as well as the natural flora and fauna.

Our river is the genesis of our great city and it's life force. In every part of our country we can see how the gift of nature and our respect for maintaining it is what makes our country thrive and prosper. We cannot do this 1/2 way in Los Angeles with Alt 13.

Thank you for your serious consideration.

Dr. Cheryl Revkin

Sent from my iPad

**From:** [christine.reyes.madiz](mailto:christine.reyes.madiz)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 2:04:13 PM

---

To whom it may concern,

As a resident of Los Angeles County and a student of an Advance Placement Environmental Science class, I greatly suggest choosing Alternative 20 for the Los Angeles River Ecosystem Restoration.

Thank you,  
Christine Reyes

Sent from my T-Mobile 4G LTE Device

**From:** [Richard Risemberg](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Alternatives  
**Date:** Saturday, November 02, 2013 7:46:40 AM

---

I certainly think the most extensive alternative, Alternative 20, should be the one the Corps implements. While it is more expensive, it will result in the most long-term results, from economic development following the redevelopment of the river and form the growth of social capital, ie lowered crime and the growth of social connectivity as more people "gather at the river."

In addition, a more widely-greened river will recharge local aquifers better, and 20% of LA's water is still local; this would benefit communities statewide as the city could eventually reduce its dependence on water imported from other, of ten unwilling "partners."

Further, having recreational and social opportunities along the riverbanks would lessen transportation burdens on streets and freeways as millions of often low-income residents would now not feel the need to travel long distances for a walk or a picnic. More attractive riverside bikeways would also entice more people to try bicycle commuting, again reducing traffic (and boosting public health).

We cannot look only at immediate costs without balancing them against future benefits with their own monetary and civic value. The broadest possible remake of the river will bring the broadest range of benefits in the near and far futures.

Thank you,

Richard Risemberg  
648 1/2 S. Burnside Ave.  
Los Angeles CA 90036  
323-428-4669

--

Richard Risemberg  
<http://www.bicyclefixation.com>  
<http://www.SustainableCityNews.com>  
<http://gridlogisticsinc.com>  
<http://www.rickrise.com>



**From:** [Armando Rivas](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Ecosystem Restoration Feasibility  
**Date:** Monday, November 18, 2013 1:02:46 PM

---

Dear Dr. Axt,

My Name is Armando Rivas. I have been a resident of Cypress Park/Mt. Washington areas (an area I like to tell my friends is the LA River District) for four years. I chose to invest in the area because of the close proximity to the LA River, Downtown Los Angeles, and the various public parks, particularly Elyria Canyon Park, Rio De Los Angeles Park as well as the close proximity to Debs Park and Griffith Park. I have lived in various parts of Los Angeles since I was eight years old. In that time, I have been fortunate enough to have resided in communities that neighbored the LA River: From South Gate/Downey, in the South East side, Montebello to the far East (which makes for a great bike ride to Long Beach and back!) to Downtown Los Angeles, until finally settling where I reside today.

Besides running a business, I am an avid runner, cyclist and hiker and I have always tried to make use of the Los Angeles River. I believe that our city has great potential. I have traveled to other countries where the thriving hubs (natural and commercial) are all immediately next to their rivers and have always dreamed that the same would happen to our beautiful baby metropolis that is Los Angeles. I have been keeping track of the progress and commend you and the Corps on your efforts to secure funding for our river. However, of the measures considered, choosing Alternative 13 came as a bit of a disappointment for me and my community.

We hoped that the measure selected would be Alternative 20, which overall provides superior funding and studies that would make the river a real natural habitat that all Angelinos would enjoy and care for. We urge you to reconsider and choose Alternative 20 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added

connectivity

- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Thank you for your time and I would like to stress how important restoration of the river is to the communities North of Downtown Los Angeles and urge to you consider Alternative 20 because it is the best restoration and sustainability feature out of the proposed alternatives. Our city needs this, and the city's residents want their city to grow and thrive all while respecting natural habitats that help individuals focus on living healthy lifestyles.

Best regards,

**Armando Rivas**

Vice President



Tel 800.707.2360  
Fax 866.846.1026

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**From:** [nickilambert@aol.com](mailto:nickilambert@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 3:50:44 PM

---

Dear Dr. Axt,

I am writing to give my support for the US Army Corps of Engineers to choose Alternative 20, the most comprehensive plan to restore the Los Angeles River.

Only Alternative 20 includes restoration of the area where the Verdugo Wash and Los Angeles River meet, and this would positively affect thousands more residents of the greater Los Angeles area.

Thank you for considering the restoration of the Los Angeles River an important project, and I sincerely hope that you choose Alternative 20.

Christina Rizzo  
Glendale, California

**From:** [Buddy](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River, Alternative 20  
**Date:** Saturday, November 16, 2013 2:28:49 PM

---

Hi Folks,

As an occasional thorn in the side, and an occasional supporter of the Corps, please allow me a moment.

I urge you to adopt the Alternative 20 proposal for the restoration of the LA River. I have lived in Atwater Village for many years, and I can speak with some certainty about how the community has prospered because of its association with the River, even when such was quasi legal. I see people all the time who speak of the benefits of living in my community, and the River is almost always brought up quickly in conversation.

These things cannot be quantified, precisely. That's your job and I appreciate that. But, there is a holistic, to use the overused term, thing going on. People feel happier with the River here and blessed with the resource. People regularly tell me the River is a blessing. The Army isn't really about that, but you guys are human beings, after all, and not the enemy. The channel was built as a defense, a means of ensuring happiness and prosperity. Now comes a time.

My feeling is that the new defense is against something different. The enemy, in those terms, is environmental destruction, and about community enhancement. When the community thrives with a sense of common place, crime goes down, neighborhoods bond, and a general peace advances. Isn't that what the Army is about, really? Not advancing conflict, but preventing it through assured strength?

In the end, the Army Corps' mission is to protect and serve. I believe Alternative 20 is the smartest way to do so. From a humane perspective, it suits your honorable mission...and I do mean honorable, because you saved LA once already. But with your new technology and expertise, it's time to move ahead to a 21st Century decency.

And, as a man who is way prudent, it makes more sense to just get the larger job done fast. The River will be restored. That is a done deal. You know that doing it piecemeal is more costly. You have to keep reassembling the team and the resources to do what you could have done from scratch, first time, straight up, done right.

You're Army. You know how to get things done. Put people to work, now, do the big thing so you don't have to go back and do it all over again. One time, done right. I know you can do this. And I realize bureaucracy is the enemy of action. Move. I think, a long time ago, that was part of an Army ad. Pretty smart one. Go Army.

Go for the great, my friends. Action pays off better and quicker than hesitation.

Your friend,  
Buddy Roberts

**From:** [Lauren Robin](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Thursday, November 14, 2013 12:33:36 PM

---

I love the la river. I want alternative 20!!!

**From:** [Robin Robinson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] SELECT ALTERNATIVE #20  
**Date:** Monday, November 18, 2013 8:29:57 AM

---

As a third generation Angelino, who has memories of what the River has been and can be again, I urge you to select Alternative #20 for the River. Do the right thing!

Kathleen Robin Robinson  
5235 Hermosa Avenue  
Eagle Rock, CA 90041

**From:** [Damian Robledo](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] RE: Draft Integrated Feasibility Report, which includes a Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Study  
**Date:** Monday, November 18, 2013 4:11:45 PM

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Dr. Axt & Ms. Jones,

I have been to 4 town hall meetings, 2 neighborhood council meetings, and 1 River Rally to voice my support for Alternative 20 as illustrated by your Feasibility Study. I would like to urge you to re-consider Alternative 20 instead of Alternative 13 as a viable option for ecosystem Restoration in the Los Angeles River.

I live and work directly adjacent to the LA River, in Atwater Village for six years and Elysian Valley for three years, and I am the perfect 'user' of the LA River. I bike to work, kayak during the pilot seasons, and walk with my family and dogs in North Atwater. My two children have discovered the natural environment in the oasis of the River's urban setting. They study the River, the concrete, the fauna, the wildlife all on their own, making observations and collecting bits of flotsam for art pieces.

The River is a huge part of my life and will affect my descendants in a profound way. I want to see the Alternative 20 plan adopted now. In 10 years, we will all look back and see that \$1 billion price tag was cheap as it has grown our residents' ability to experience an amazing ecosystem. The return on doubling this investment is logarithmic in benefits beyond the slides and presentations I've seen at all those meetings in the last 45 days. To integrate historic, cultural, artistic and recreational uses and at the same time meeting the USACE goals for riparian , hydraulic and habitat restoration seems like a win-win for all.

Please also consider these comments I have on the study:

1. Rectify the USACE Study with the draft RIO PLAN overlay as proposed by LA City.
2. Revise and re-engineer and study the fences, borders or jurisdiction and the design of those fences so that people may access the River channel without obstruction.
3. Rectify the USACE study's estimates for remediation and mitigation of soil contamements on the Piggyback, G2 and other parcels to reflect DTSC and EPA discoveries. The acknowledgement of these 'brown fields' in the Study seem less attentive than other parts of the robust draft report.
4. Handicap accessibility for ramps, access to river bed and to water seems like it could use much more study and design.

Thank you very much for the time and effort. Please take it to the next level and adopt Alternative 20 without hesitation. Add humanity to the equation of Alt 13 and you get Alternative 20. With out the human element, to what end does restoration of the River end. Expand your look beyond the CHAP criteria and please think with other metrics.

I hope you get to the same conclusion I have made. Choose Alternative 20 and be my family's hero for generations to come.

Respectfully yours,



Damian Robledo  
4044 Brunswick Avenue  
Los Angeles, CA 90039

[damian.g.robledo@gmail.com](mailto:damian.g.robledo@gmail.com)

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**From:** [Dave Rock](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for Alternative 20  
**Date:** Tuesday, November 05, 2013 6:04:28 PM

---

I would like to express my support for Alternative 20 for the LA River Restoration contained in the US Army Corps of Engineers LA River Ecosystem Study.

My family and I spend a great deal of time walking, bicycling and exploring the LA River and have taken advantage of the recent changes in law allowing us to kayak down the river.

I think the more the better when it comes to the development plan, and that the continuity allowed by Alternative 20 will increase the access for more Angelenos. Forward thinking, ambitious planning now will lead to a more verdant, vital and peaceful Los Angeles for our children's future.

Thanks,

Dave Rock  
Los Angeles, CA

**From:** [Sara Rose](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River - Alternative 20 YES!  
**Date:** Saturday, November 16, 2013 8:20:01 AM

---

Attn: Josephine R. Axt, Ph.D.; Chief, Planning Division

The change in attitude that the communities surrounding the Los Angeles River have made over the last 25 years is phenomenal. Most Angelenos did not know that there was a river, and if they did, it was not something to celebrate. Now, a conversation about the river draws immediate comments about what a great resource it is.

I have long enjoyed walks along the river, and whenever I have taken someone there and introduced them to the parks and paths along the river, they have been equally revived. I think that the master plan Alternative 20 will make the river more accessible and give many generations of our hard working citizens a place to walk or sit and reflect.

When you think of the many many years of use and enjoyment that so many people will get out of this project, the cost seems like a very small price tag. It also seems that a project that ups the happiness factor cannot help but improve the economy and people's prospects in life, and pay for itself over time.

Thanks for taking the time to read this,

Sara Rose

**From:** [George R. Rossman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support for Alternative 20  
**Date:** Thursday, October 17, 2013 2:27:29 PM

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I am in favor of the maximum reasonable restoration of our LA river systems to provide wildlife habitat, esthetic values, and recreational opportunities.

As a child, I grew up in the upper Midwest where rivers where river systems were a major source of wildlife habitat and provided esthetic and recreational opportunities. I have also traveled to other cities where rivers were confined for flood protection, but still developed with ecosystem and environmental values in mind and served a variety of recreational uses for the local population. The particular example of Austin, Texas, comes to mind with the pleasing environment of the shores of the Colorado River near the Congress Avenue Bridge where the urban bat colony has become a major attraction.

In short, I have seen how flood considerations and environment can co-exist, and how much Los Angeles could benefit if we would do the same.

Two of my recreational interests are birding and hiking, both of which could benefit by thoughtful restoration of the environment of the river systems of Los Angeles and surrounding communities. Both for my personal desires, and for a vision of how restoration of the river environment will help current and future generations, I voice my support for Alternative 20 for the LA River.

George Rossman  
Pasadena, CA

**From:** [robertarouge@juno.com](mailto:robertarouge@juno.com)  
**To:** [MHigby@Primenet.com](mailto:MHigby@Primenet.com)  
**Cc:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Re: Los Angeles River Ecosystem Study  
**Date:** Tuesday, September 24, 2013 4:53:53 PM

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The Corps Study Promises to Revitalize the LA River

<http://www.lariverrally.org/corpsstudy.htm>

For those who live or have lived in Los Angeles, know that the L A river has been primarily configured to act as the city's main **Flood Control Channel (51 miles long)**

During the rainy seasons (before the droughts), severe erosion occurred of its banks  
That is the reason the U S Army Corps of Engineers had most of it lined with concrete many years ago.  
All of the many other channels better known as "XXXX Wash" that connect to the L A River were also lined with concrete many years ago

In the interest of public safety, the entire flood channel system was banned entry into its banks and of course the rivers/channels themselves, except for fenced off Bicycle, Equestrian and Pedestrian pathways.

So, now they want to "Revitalize" it at taxpayer expense of "Estimated Cost: \$375 million"; "Estimated Cost: \$453 million"; "Estimated Cost: \$804 million"; "Estimated Cost: \$1.08 billion"; depending on which plan is selected?

<http://www.lariverrally.org/corpsstudy.htm>

Yes, it creates jobs...And it creates costs to maintain it...Will it attract crime and vagrancy?

You decide home and sales taxpayer... Our sales tax in L A county is already 9%...Want more?

---

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**From:** [Anthony Saccacio](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Subject: Comments on Los Angeles River Ecosystem Restoration Draft Integrated Feasibility Report  
**Date:** Saturday, October 12, 2013 6:51:30 PM

---

We get one chance at it for the future. Let's go all the way.

From: [sandovalbarbara@netzero.com](mailto:sandovalbarbara@netzero.com)  
 To: [SPL Comments LA River Study](#)  
 Subject: [EXTERNAL] comments in support of Alternative 20 for the L.A. River  
 Date: Thursday, October 17, 2013 6:42:39 AM

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Under Alternative 20, the ties between the river and Los Angeles State Historic Park would be enhanced through the creation of wetlands and a marsh. It is the only choice that connects the river to the park.

While the revitalization of the LA River is a very important environmental, quality of life, and economic development initiative, it also honors the historical aspects of Los Angeles State Historic Park and the families that continue to have ties to the land.

My niece, Carolina Lugo, is a descendent in the long lineage of one of the California Land Grant Families. Don Antonio Maria Lugo received a land grant from the King of Spain in 1781 and many generations of Lugos have lived, or are currently living in the Los Angeles area.

Restoring this area of the River and Los Angeles State Historic Park may give my niece, and countless others, the opportunity of a lifetime to see, feel, and experience what the land, river, and area was like when Don Antonio's son Vicente Lugo built his adobe house. As such, I support Alternative 20 as the most comprehensive plan to revitalize this area of Los Angeles.



**(1905)\* - Exterior front view of the two-story Vicente Lugo adobe house, seen with  
 hipped roof and dormer windows. The home is located at 518-520 North  
 Los Angeles  
 Street and Sunset Boulevard, and faces the Plaza. When this photograph  
 was taken,  
 the adobe was home to the Pekin Curio Store with brick buildings  
 flanking it on either  
 side; and the road was still unpaved.**

#### **Historical Notes**

**La Casa de Don Vicente Lugo located on the east side of the El Pueblo  
 Plaza at North  
 Los Angeles Street and Sunset Boulevard. Built in 1839 by Vicente Lugo,  
 it was one  
 of the few two-story homes in Los Angeles at the time. It was donated in  
 1867 to  
 St. Vincent's College (which later became Loyola University), the first  
 college in  
 Southern California; but later became known as the Washington Hotel,  
 and later,  
 the Pekin Curio Store. Unfortunately, the structure was so altered, that it  
 does  
 not resemble an adobe.**



The Lugo family was one of the founding families and first settlers of Los Angeles in 1781.

The site of the Vicente Lugo adobe house was designated California State Historic Landmark No. 301 Click [HERE](#) to see the California Historical Landmarks in LA Listing.



(1869)\*\* - The Plaza and 'Old Plaza Church (Mission Nuestra Senora Reina de Los Angeles). The square main brick reservoir in the middle of the Plaza at the right was the terminus of the town's historic lifeline: The Zanja Madre (Click [HERE](#) to read more on the Zanja Madre). The building in the top right background was the Lugo House: first home to St. Vincent's College (now Loyola Marymount University). Click [HERE](#) to see more Early Views of the Los Angeles Plaza. Location: 535 N Main St near Macy St, Los Angeles.

Source: [http://waterandpower.org/museum/Early\\_Plaza\\_of\\_LA\\_\(Page\\_2\).html](http://waterandpower.org/museum/Early_Plaza_of_LA_(Page_2).html)

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**From:** [Kathryn Savage](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative20 - L.A. River Restoration  
**Date:** Thursday, November 07, 2013 9:10:43 PM

---

Please support Alternative 20 as the plan to restore the L.A. River.

Thank you,  
Kathryn Savage  
12354 Sarah Street  
Studio City, CA 91604

**From:** [Ernest Scarcelli](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Eric Garcetti](#); [councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org); [Dianne Feinstein](#)  
**Subject:** [EXTERNAL] L.A. River Plan  
**Date:** Friday, November 08, 2013 10:25:14 PM

---

I am a native-born Angelino and find it hard to believe that with all the other problems in our city, special interest persons are driving valuable time and resources to this project. I could see some value in this project but currently, there are so many other needs which I do not need to list here.

Stop the madness, and if federal funds are available, begin to improve the infrastructure of the city. Locally, the mayor and council need to stop allocating city funds to this project.

Ernest Scarcelli  
Van Nuys

**From:** [Marilyn Schmitt](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Plan for the Los Angeles River  
**Date:** Monday, November 18, 2013 4:59:03 PM

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To the U.S. Army Corps of Engineers:

I reject your choice of Alternative 13 as your Tentatively Selected Plan for the Los Angeles River. It fails to consider key factors of our unique environment and falls far short of achieving meaningful transformation in our degraded urban watershed.

PLEASE CHANGE YOUR CHOICE TO ALTERNATIVE 20. It will connect important corridors and conserve more open space for the health of the wildlife and people of Los Angeles.

YOU HAVE SCREWED UP ENOUGH, here and elsewhere!! Do the right thing and make this a SUCCESSFUL project.

Marilyn Schmitt  
Los Angeles  
[mschmitt4@aol.com](mailto:mschmitt4@aol.com)

**From:** [Victoria Shabanian](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative 20 Los Angeles River  
**Date:** Tuesday, October 15, 2013 7:35:53 PM

---

I am a 33-year resident of Glendale, California and support alternative 20 for restoring the Los Angeles River. Anything less will be forfeiting a historic opportunity to turn what remains mostly an eyesore back into the flourishing ecosystem it was meant to be. Half-measures will be of muted impact along this lengthy concrete spine of the sprawling city of L.A. The Army corps ravaged the river's ecosystem to meet the need for flood control in a by-gone era. Now is the time to restore to Los Angeles its rightful legacy in the form of alternative 20.

Victoria Shabanian  
1319 Opechee Way  
Glendale CA 91208

**From:** [Margaret Shipman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] choice of proposal  
**Date:** Saturday, November 16, 2013 8:26:10 AM

---

Dear People,

We have SO little water in Los Angeles that I was once asked "There is an LA River?"  
We need to live and share every drop of water to its fullest and I urge you to reconsider ALTERNATIVE 20 as the best way to do this.  
Thank you for your consideration, Margaret Shipman

**From:** [Gil Shorr](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Restoration  
**Date:** Monday, November 18, 2013 11:33:21 AM

---

Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
ATTN: Ms Erin Jones, CESPL-PD-RN  
[comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

Dear Dr. Axt:

We have lived in the San Fernando Valley for over thirty years, so the choice of plan for the LA River is of great importance to us. We join with Mayor Garcetti, FoLAR, Senator Boxer and so many others in urging you to adopt **Alternative 20**, whose comprehensive nature will do so much for the balance of sustainability, urban living and the enhanced reputation of Los Angeles as a dynamic, forward-looking city that values its natural resources as highly as the other aspects of its footprint. Selecting any of the alternatives could so easily lead to many years of unresolved issues and the real possibility of a higher price tag in the end; it's our opinion that we should put our shoulders to this excellent plan now, find the funding for **Alternative 20** and start to enjoy the recuperative properties of our Los Angeles River.

Thank you.  
Sincerely,

Gil and Herschel Shorr  
5430 Gentry Avenue  
Valley Village, CA 91607  
[gil.shorr281@gmail.com](mailto:gil.shorr281@gmail.com)



**From:** [Duncan Sinclair](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Ecosystem Restoration  
**Date:** Thursday, October 17, 2013 10:19:46 AM

---

Dear Dr Axt,

Regarding the alternatives for restoring the Los Angeles River, I fervently hope that the Army Corp of Engineers will select Alternative 20.

Los Angeles needs all the native habitat restoration it can get. It would be a great asset to the city.

Thank you.

Duncan Sinclair  
812 E Mountain St  
Pasadena CA 91104

**From:** [Nicole Siskind](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Support Alternative 20  
**Date:** Thursday, October 17, 2013 10:35:22 AM

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I support the L.A River and Mayor Garcetti's choice of Alternative 20 for our own L.A. River.

I went on a L.A. River Expeditions this summer and discovered our beautiful River for the first time. All our citizens deserve to experience our river, a natural asset right in the middle of our town. I love the bike lane also.

Thank you,

Nicole Siskind  
836 Wonder View Drive  
Calabasas, CA 91302

**From:** [Jerry Smith](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] The Los Angeles "River" project  
**Date:** Wednesday, October 09, 2013 3:03:22 PM

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Digging out the flood control system and replacing it with more natural sides sounds good. Aided by the proponents drawings of what they imagine it could be, one can fall in to that trap. Changing it is a bad idea for these reasons:

1. The water flow is either a trickle or a roaring cataract. In either case, it's not good for public use.
2. The proposed landscaping around the trickle is an attractive nuisance for children and would no doubt attract homeless and perverts as well. When I went to a meeting selling it, no one had any idea of how to fish the dead children out.
3. The ever present behind the scenes land developers (Eli Broad, et al), wish to build more expensive condos with a view after ripping out the dingbat apartments presently next to the flood channels and displacing the low rent tenants.
4. The expense would be enormous for no worthy return.

Wouldn't it make much more sense to take the money (if you must spend it), and dam some canyons for water catch basins?

I know this is already a done deal like Jerry Brown's trolley to San Francisco, but I had to put my 2 cents in.

JS

**From:** [Kathy Squires](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Keep the river open for public use.  
**Date:** Thursday, October 17, 2013 6:09:16 AM

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I am a native Angeleno. I look forward to visiting the space during this school year.  
Please support them as I do.  
Kathy Squires  
Granada Hills

**From:** [Peter Stemwedel](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Please consider alternative 20  
**Date:** Monday, November 18, 2013 12:30:48 PM

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To Whom It May Concern:

Please count me and my family in favor of the more comprehensive restoration plan for the Los Angeles River.

I bike, walk and picnic along the banks of the river with my friends and family. We live just a couple miles away. The area has so much potential. Please give the river the chance it deserves to serve the people of Los Angeles. This is money well-spent to provide recreational opportunities in an underserved area.

Thank you for your consideration.

Sincerely,

Peter Stemwedel

1575 Hazelwood Ave  
Los Angeles CA 90041

**From:** [Rody Stephenson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments on LA River plan  
**Date:** Thursday, October 17, 2013 2:34:09 PM

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I think we should do it right and go with option 20.

I have discovered the LA River this last year, and have walked both sides from Griffith Park to the Pasadena Freeway. It is wonderful.

Let's make it nice and accessible from Griffith Park (Glendale Narrows) to at least Union Station.

Wider, less concrete, more wetlands for the birds.

Rhoads

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R. Rhoads (Rody) Stephenson  
4455 Rockland Place, Unit 10  
La Canada, CA 91011  
[rodys@earthlink.net](mailto:rodys@earthlink.net)  
(818) 248-7472

**From:** [Carl Stilwell](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alternative 20  
**Date:** Saturday, November 16, 2013 9:48:13 AM

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I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. However I agree with FOLAR that Alternative 13 falls far short of achieving meaningful transformation in our degraded urban watershed. To remove more concrete, create more habitat, connect important corridors, and conserve more open space for the health of the wildlife and people of Los Angeles, I strongly urge you to select the more comprehensive ALTERNATIVE 20 instead.

Sincerely Carl Stilwell  
Pasadena, CA



**From:** [Dan Stowell](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] In support of Alternative 20  
**Date:** Friday, October 18, 2013 3:22:38 PM

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To whom it may concern,

Writing to voice my strong support for Alternative 20 and encourage the Corps to proceed with this truly transformative public plan.

Thank you!

--

Dan Stowell  
646-528-1616

**From:** [Nancy Strick](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] kayaking the LA river has been a wonderful experience. I hope everything is done to get the river open and healthy. it is truly a treasure and it is wonderful to be able to spend time on the river. It is was of our city's assets.  
**Date:** Thursday, October 17, 2013 11:11:26 PM

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Please note my new email address: [nkstrick@gmail.com](mailto:nkstrick@gmail.com)

**From:** [sulli@ucla.edu](mailto:sulli@ucla.edu)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. River  
**Date:** Saturday, November 16, 2013 6:46:42 AM

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Hello -- I urge you to choose Alternative 20 as the plan for the Los Angeles River. I am a lecturer in geography at UCLA and have been writing about the region for many years. Please listen to us.

Thank you, Dr. Robert E. Sullivan.

**From:** [suntree susan](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] The Los Angeles River Study  
**Date:** Sunday, November 17, 2013 9:54:43 PM

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Josephine R. Axt, Ph.D.; Chief, Planning Division  
U.S. Army Corps of Engineers, Los Angeles District  
P.O. Box 532711  
ATTN: Ms Erin Jones, CESPL-PD-RN

Los Angeles, CA 90053-2325

Dear Dr. Axt:

For twenty-five years I have studied, written about, created performances at and about, and walked along the Los Angeles River. My recent award winning book, Sacred Sites: The Secret History Of Southern California (University of Nebraska Press 2010) about the origins of our region's landscape and indigenous cultural heritage, prominently features the Los Angeles River. At East Los Angeles College, The American Jewish University, or Pomona College, when I teach courses based on this book or mythology or local cultural history, I feature the Los Angeles River because it represents the circle of life in Los Angeles. It is the connecting waters, the center pole of the region.

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2<sup>nd</sup> largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat

Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)

- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river connections, rather than just culverts or pipes
- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
  - The Other Social Effects analysis shows Alternative 20 with its larger scope will:
    - Produce a greater connectivity with the people and communities
    - Reach more of the census tracts with high poverty and high minority populations
    - Provide more green areas to encourage physical activity
    - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely, Susan Suntree

**From:** [Chris J. Suri](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Statement about the L.A. River recent developments and plans (including Alt. 20)  
**Date:** Sunday, November 17, 2013 8:46:33 PM

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Thank you for providing a platform for Los Angeles County citizens to participate in the L.A. River future projects planning process. I support Alternative 20. The ideas put forth by innovative groups and individuals have shown that the L.A. River has great potential for connecting further the communities it passes through as well as cities and communities that are in Southern California overall. One aspect of the potential L.A. River improvements towards a more green L.A. that I am excited about is bicycle infrastructure, cyclists, and environmental trends that may come about as a result of building and improving bike paths and overall accessibility and connectivity for cyclists along the L.A. River. Thank you once again for everything you are working towards to make L.A. a greener place.

Sincerely,  
Chris J. Suri

**From:** [Daniel Szuhay](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [George Wolfe](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Sunday, November 17, 2013 10:07:13 PM

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Hi,

My name is Dan Szuhay. I had the distinct honor and privilege to work with George Wolfe and LA River Expeditions this summer for a couple months. What an amazing experience!

A little about me. I am originally from Pittsburgh PA where there are 3 amazing rivers. I went out and did crew on the Allegheny river many years ago. I have watched those 3 rivers become more and more vibrant and alive over the years with the decline of the steel mills. It's unfortunate that an entire business had to close to save those rivers.....but they are now green and a major draw for new development and recreation for the entire city.

I came to LA in 1997 and was immediately drawn to the LA River. I have rollerbladed on the bike path along the 5 freeway for many years now. I have also helped clean up the river with FOLAR. The LA river and all the birds that visit the river are very important to me. So when I had an opportunity to help people kayak the LA River this summer I jumped at the opportunity. And I am not a spring chicken (I am 48). I don't jump as easily as I once did.....

The LA River is an incredible resource that most people here don't even know exist. I have to believe that the more investment that is made in the river will only come back in even greater dividends to the city and all the people who call LA home and who visit this wonderful city.

I strongly urge those with the decision making powers to make the most robust and generous investment in revitalizing the LA River.

Now is the time! It's worth it! A billion dollar investment will payoff handsomely in many, many different, unimaginable, wonderful ways. I do believe this to be true.

I am working towards becoming a licensed psychologist. I have joined a private practice downtown in the Fine Arts Building (another LA treasure) as a psych assistant under the supervision of a psychologist. I am pretty sure one of the reasons I got this position was because I was helping put people in kayaks this summer. My supervisor was SO excited about my working for a kayak firm that he told his father about what I was doing and his father flew to LA from Long Island, NY to kayak the LA River. I was thrilled that my new boss, his wife, and his father were able to kayak the LA River this year. They had a blast.

No joke.....someone flew from Long Island NY to LA this summer to kayak the LA River.....the possibilities are endless.....this is real.

Please make that big investment now.....it will pay off!

Dan

Daniel S. Szuhay, MA  
Doctoral Candidate, Pacifica Graduate Inst.  
1129 N Hoover St  
Apt 207  
Los Angeles, CA 90029  
dszuhay@sbcglobal.net  
323-304-1280



**From:** [Tony Taylor](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments on the USACE Los Angeles River study  
**Date:** Tuesday, October 01, 2013 9:42:25 PM

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I am writing to express opposition to ALL the proposals put forth in the \$10 million dollar study on the LA River done by the Army Corps. All these plans are way to expensive and really do nothing to restore the river. Instead of these flights of fancy the real restoration of the LA River can accomplished easily and at a modest cost by simply cleaning up the water and improving its quality and removing all the accumulated trash in the trees, rocks and water and keeping it removed. Spending huge sums of money on flights of fancy that may or may not work and that most definitely will not be maintained is a waste of good taxpayer monies.

Tony Taylor  
6737 Denny Avenue, #50  
North Hollywood, CA 91606  
(213) 925-1989

**From:** [Tony Taylor](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River Study comment  
**Date:** Tuesday, October 01, 2013 9:50:14 PM

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I am writing to express my opposition to all the proposed plans for the so called "restoration" of the Los Angeles River. None of these plans will accomplish real restoration of the river and would only put a tremendous burden on already overtaxed taxpayers for something of questionable value and that most likely would not work. Real restoration of the Los Angeles River can be accomplished very easily and at modest cost by improving water quality and removing and keeping gone accumulations of trash in vegetation on the sand bars (islands), rocks and in the water.

Tony Taylor  
6737 Denny Avenue, #50  
North Hollywood, CA 91606  
(213 925-1989

**From:** [Carol Teutsch](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Comments in support of alternative 20  
**Date:** Sunday, November 17, 2013 4:36:56 PM

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Dear Corps of Engineers,

Thank you for your thoughtful evaluation of the river and its potential. I felt your presentation to the public a few weeks ago was very helpful. As a physician, I am increasingly impressed that human health is tied to the health of our ecosystems and climate. The LA River restoration can be a critical investment in both. Having moved here just 5 years ago and thinking LA had no river and wondering why we had so many bridges. I did some reading and learned about the extraordinary history of water and the river here. I discovered the river by accident and came to appreciate the great bird ecosystem and the power of nature to restore itself. I felt in love with the river and joined FOLAR. I learned about how park poor LA is and how important this could be in restoring active mobility for many citizens and for helping to conserve water in this water poor city. I am struck by the contrasting fights in transportation where Metro and Cal Trans want to shove a very disruptive poorly thought out 13 billion dollar tunnel on the citizens of LA that we don't want and the hesitancy to build a one billion dollar restoration project that we do want that will benefit so many in all walks of life and all socioeconomic strata.

I urge you to select alternative 20 which will allow us to more fully invigorate our city and our treasured ecosystems.

LA will come together on this project and can lead other cities forward boldly on this path with your help.

Thank you.

Carol Teutsch, M.D.  
841 Moon Ave  
Los Angeles, CA 90065

**From:** [Aaron Thomas](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] l.a. river comments  
**Date:** Monday, November 18, 2013 3:09:23 PM

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To whom it may concern,

As a resident who has lived within one mile of the Los Angeles River for many years, I am deeply interested in the latest studies by the Army Corps of Engineers for possible improvements of the river. In addition to living adjacent to the river, I have also spent nearly 20 years working for a non-profit that has planted thousands of trees and built multiple parks along the banks of the river. Needless to say, I am biased in my opinion of what could be done there. That being said, I would like to go down on record as strongly supporting the 1 billion dollar, Alternative 20 option. Because I have lived so close to the river and dedicated so much of my life to its rehabilitation, I can describe first hand the importance of such an endeavour. The work that my organization has done on the river has literally changed lives for the better. Whether those be the lives of local "at risk youth" who we hired to help us plant and learn about nature or the animals who rely on the river for sustenance, or the lives of the native trees and plants that have been reintroduced, our small efforts have helped make our world a better place. Perhaps most importantly, we have used our trailblazing projects to demonstrate the possibilities of what could be done. Now our government is in a position to take the next step and create large scale, long term change and improve millions of lives, both human and non-human. On behalf of what is good and right in life, I ask that you help us make as many improvements to our river and our city as possible. As an investment, it will definitely pay off.

Aaron Thomas  
Urban Forestry Manager  
North East Trees  
213.798.9190 (cell)

**From:** [Eddie Thompson](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [contact@folar.org](mailto:contact@folar.org)  
**Subject:** [EXTERNAL] Support Alternative 20  
**Date:** Saturday, November 16, 2013 8:32:01 AM

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Greetings:

I am writing today in support of alternative 20. I am Eddie Thompson from Burbank CA and have been riding my bike on the 8 mile stretch bike path ever since I moved here seven years ago.

Seven years ago my opinion of the river was much different than it is to day. I became involved with FoLAR and volunteer to pick up trash. I have personally witness the hard work which has increased the growth of wild life and natural habitat. The work on Sunny Nook park has increased visitors with cameras. And today I see Kyakes too. It's hard to describe the awesomeness of nature and how beautiful it can be.

Now I'm involved in a support group who shares their experiences which help them to recover. My share will usually have something to do with my experience on the bike path. Help me prove to my group that when I say I saw a Blue Heron catch a fish.....I don't get laughed at and told "Eddie that was a Seagull with a beer can in it's mouth"

Thank you all your help on behave of all my wild life on the river.

Eddie Thompson  
1315 N. Brighton St.  
Burbank CA. 91506  
818 260 0449

**From:** [Kalee Thompson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support option 20!  
**Date:** Thursday, October 17, 2013 7:35:00 PM

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My family supports option 20 for restoring the LA river. We use the river for biking, walking, and bird-watching. We want to see restored habitat and healthy ecosystems that include extensive recreation along the river. The effort is worth it—let's think about the plan that will be best for LA 10, 20, and 50 years into the future. Option 20!

Thanks,

Kalee

Kalee Thompson  
718.930.9891  
Twitter: Kaleewrites  
Read My Book!  
WWW.DEADLIESTSEA.COM

**From:** [David Thorne](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] alternative 20  
**Date:** Saturday, November 16, 2013 1:10:55 PM

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why not go all out?  
I support alternative 20  
for river restoration.  
sincerely,  
David Thorne  
business owner in elysian valley

sent from earth



**From:** [Jill Katharine Thraves](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Wednesday, October 09, 2013 10:28:05 AM

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Hello,

I want to voice my support for Alternative 20 in the plan to revitalize the LA River. If we are going to do this after all this time, let's do it properly.

There has been so much degradation of the natural environment in and around Los Angeles over recent years that we should take full advantage of this opportunity to correct some of the wrongs. How lovely it would be to enjoy the LA River as a real river with walks and native plantings and wildlife. And Alternative 20 takes a broader view which means lots of jobs are created into the future.

Most large cities are built around large beautiful rivers which the citizens and visitors can enjoy. All we have is drainage channel and it is not even graced with a name!

Please let's choose Alternative 20 and do it properly.

Thank you,  
Jill Thraves,  
Studio City

**From:** [Frances](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [Frances Thronson](#)  
**Subject:** [EXTERNAL] LA river plan  
**Date:** Saturday, September 14, 2013 9:51:52 PM

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So if there are no cost overruns -- none -- (in what universe?) this will cost \$41 million per mile....

In plain English, can someone explain the point of this enormous expenditure?

Respectfully submitted,  
Frances Thronson

Sent from my iPad

**From:** [Jennifer Tokash](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River  
**Date:** Sunday, November 17, 2013 3:12:29 PM

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Hello,

My name is Jennifer, I was born in CA, but just moved to Los Angeles in 2012. I'd never seen a concrete river without water until I moved to LA. I'm looking forward to making the river a river again!

I appreciate the time and efforts the Corps and City have expended to work with the community and prepare the Los Angeles River Ecosystem Restoration Feasibility Study and Environmental Impact Statement/Environmental Impact Report, Draft Integrated Feasibility Report. I am thrilled that the Corps and City have worked with us to be on the same side of the Los Angeles River Ecosystem Restoration! I have reviewed the report in detail and I am providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in your study as the Tentatively Selected Plan, I found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Major concerns are that the following were not adequately recognized in the selection:

- Compatibility with the National initiatives and programs, particularly the President's American Great Outdoors Initiative and the Urban Waters Public Partnership, that recognize the importance of the LA River to habitats, species, and people
- The richness of this biodiversity hotspot
- The rarity of the region's Mediterranean climate
- The intense destruction and overdevelopment in the 2nd largest U.S. City

Alternative 20 is far superior to Alternative 13 for the following reasons:

- CHAP is only one tool that should have been used to value the habitat
- Connectivity for wildlife migration, seed dispersal, and hydrology (205% greater than 13)
- Verdugo Wash is critical to providing this connectivity from the LA River to the Verdugo Mountains, Los Feliz Golf Course, and San Gabriel Mountains
- Piggyback Yard includes real restoration with concrete wall removal, creation of wetlands and elevation of the railroad segment to increase hydrologic and wildlife connections
- Cornfields includes real restoration with higher value habitats by terracing the bank and creating freshwater marsh
- Cornfields provides connection to the Elysian Park
- Reduction of distances between the habitat nodes greatly enhances the value
- It is more similar to the ecosystem that historically existed prior to the channel
- The length of area restored is 2 times greater (6.4 miles vs. 3.2)
- More than 3 times the concrete is removed (117,918 cubic yards vs. 36,891)
- Creates 131 more acres of restored habitat (719 vs. 588)
- The habitat restored creates a higher quality of ecosystem because it restores more natural river

connections, rather than just culverts or pipes

- More likely to be sustainable and resilient over the life of the project because of the size and added connectivity
- Measures the highest of all alternatives against the 19 performance targets established under the 2 objectives
- Meets the 4 evaluation criteria (effectiveness, completeness, efficiency, acceptability) the most robustly
- The Regional Economic Development analysis shows Alternative 20:
  - Provides 7015 more jobs and \$386 million more in wages during construction
  - Creates 3700 more new jobs and \$251 million more in wages for redevelopment over the long term
  - Creates 1094 more new permanent jobs valued at \$62 million more
- The Other Social Effects analysis shows Alternative 20 with its larger scope will:
  - Produce a greater connectivity with the people and communities
  - Reach more of the census tracts with high poverty and high minority populations
  - Provide more green areas to encourage physical activity
  - Provide more green areas to reduce air quality effects

Restoration of the Los Angeles River is crucial to us and our City! The project is worth the added costs because of the added values stated above that were not sufficiently counted in the report comparisons. We urge the Corps and City to select Alternative 20 because it provides the best restoration and the best sustainability for the future.

Sincerely,

Jennifer S. Tokash

**From:** [Flora L. Thorton](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, November 18, 2013 10:57:01 AM

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There is no point in considering a "cheaper" alternative, which will only rob Los Angeles of a fulfilling and useable project that will serve us for decades.  
Kay Tornborg, Homeowner, Hollywood, CA

**From:** [Katherine Trisolini](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Integrated Feasibility Report  
**Date:** Monday, November 18, 2013 5:04:31 PM

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November 18, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division;  
U.S. Army Corps of Engineers; Los Angeles District;  
P.O. Box 532711;  
ATTN: Ms. Erin Jones, CESPL-PD-RN;  
Los Angeles, California 90053-2325

VIA EMAIL: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

RE: Los Angeles River Ecosystem Restoration Integrated Feasibility Report

Dear Ms. Axt and Colleagues,

As a practitioner and now professor of environmental law in California, I have submitted comments on numerous environmental impact documents since I graduated from Stanford Law School in 1999. I have taught courses in environmental law at UCLA and Loyola Law School, Los Angeles. I am currently an Associate Professor of Law at Loyola Law School. In addition to extensive litigation and administrative proceeding experience in environmental law, I have taught, lectured, and written about the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), and climate change. I write in my capacity as an individual with expertise in environmental law, not as a representative of any of the abovementioned institutions.

I am writing to urge the Corps to adopt Alternative 20. While the Corps' efforts to restore the LA River and address ecosystem degradation are admirable, the Report significantly understates the benefits of Alternative 20. Anticipated impacts from climate change render aggressive river restoration absolutely critical. Calculating plan benefits under current climate conditions fails to adequately represent how River restoration will be essential to offset climate change stressors in the future. The projects long time frame, 50 years (App B p. 1) necessitates consideration of climate change adaptation benefits into that cost-benefit analysis.

To compare the costs and benefits of this project with regards to habitat, the Report employs the CHAP Evaluation method – which improves on prior methods by evaluating habitat at the ecosystem level. The Report then projects 50 years into the future to compare a baseline without the project versus a future with project alternative. Given this timeframe, climate change can be expected to degrade baseline conditions. This does not appear to be fully captured in the model. Species will face increased temperatures, increased fire risk, and increased pollutant loads due to climate impacts. Both water supply and water quality will suffer as temperatures in California and the LA basin rise, impacting residents and endangered species, and other environmental resources in the area. Changes in supply and water quality will adversely affect habitat as well. Researchers have emphasized the need to minimize other environmental stressors to aid endangered species’ ability to adapt to climate change. Moreover, climate change renders more urgent Los Angeles’ efforts to significantly shift its water planning from channelizing storm runoff in concrete towards a system that naturally filters and replenishes groundwater.

Finally, benefits not incorporated include increased habitat connectivity. Researchers have repeatedly stressed the need for improved connectivity to allow species adaption.

I urge the Corps to adopt Alternative 20.

Best regards,

Katherine Trisolini

Katherine Trisolini  
Associate Professor of Law  
Loyola Law School  
919 Albany Street  
Los Angeles, CA 90015  
Ph: 2130736-8368



**From:** [Linda Umbdenstock](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 Preferred  
**Date:** Sunday, October 27, 2013 4:18:09 PM

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I agree with the LA Times: is the the one opportunity to get it right and that means Alternative 20. As a local, I see what the neighborhood kids can get excited about in their community with their own efforts to clean up the river. It changes whole, lower income communities for the better. The river is also part of our historical heritage as one of the great cities, not only in the US, but as a Pacific gateway as well. This is investment in the future: by infrastructure, *community* development, environment, education, recreation.

Linda U  
Los Angeles, Ca 90065

**From:** [Steve Unwin](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River study  
**Date:** Saturday, September 28, 2013 3:12:02 PM

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Dear Dr. Axt,

Just a quick note to express my support for Option 20.

I've been exploring LA by bike. From Pasadena to downtown, and up to Griffith Park. And down to Whittier Narrows and even sometimes to Long Beach.

LA is friendlier to bikes than most people imagine. But expanded recreation opportunities would be wonderful. It's a way of linking neighborhoods in a way that freeways never can.

I hope we can make this happen. It's a project worthy of a great city!

Thanks,  
Dr. Stephen Unwin

**From:** [santuri123](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Revival of los angeles river  
**Date:** Wednesday, October 23, 2013 8:19:03 AM

---

To whom it may concern,

I am 46 years old and I was born and raised in los angeles. I have been following closely and monitoring the developments concerning the los angeles river for many years now. After having read all the options that have been presented to us my family and I support Alternative 20 100%. For all the obvious reasons.....

Thank you,  
Oscar Uribe

Sent from my Samsung Galaxy Note® II

**From:** [Nestor E. Valencia](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Wednesday, October 16, 2013 8:37:36 AM

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When will the "greening" of the river get to the southeast?

Sent from my Verizon Wireless 4G LTE Smartphone

**From:** [Chris Van Hook](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] L.A. River project  
**Date:** Thursday, October 17, 2013 10:13:39 AM

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Please support Alternative 20. It is the best plan for the Los Angeles river. Los Angeles needs this river to be viable for everyone to enjoy as a natural resource! Los Angeles does not have enough open spaces for people to enjoy. This river should be a jewel in Los Angeles. It needs maximum attention. Please choose this Plan! I am sorry I cannot attend the meeting, but I am there in spirit. Thank You  
Chris Van Hook.

**From:** [Villasenor, Vernon](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River ARBOR Study  
**Date:** Monday, October 14, 2013 9:08:10 AM

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Josephine R. Axt,

I am writing to you to reconsider the selection of Alternative 13 in favor of Alternative 20. Alternative 20 is much more holistic, providing broad benefits and positive impact, ultimately getting done what needs to be done. The Ecosystem Restoration of the Los Angeles River requires a bold move and alternative 20 is that move. Let's capitalize on the tremendous efforts taken to date to implement the best, most impactful plan for the long run.

Thank you for your time and consideration

Sincerely,

**Vernon Villasenor**

Desk | (949) 286-7534 | Wireless | (714) 743-5111 |  
[vernon.villasenor@verizonwireless.com](mailto:vernon.villasenor@verizonwireless.com)

**From:** [Alissa Walker](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] public comment for LA River  
**Date:** Sunday, November 17, 2013 7:55:51 AM

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This article was originally published at A Walker in LA on May 28, 2013. You can see more photos and the entire story posted here:

<http://www.awalkerinla.com/2013/05/28/kayaking-in-my-neighborhood/>

Please restore the LA River so I will be able to show my children the joys of kayaking in their neighborhood, too.

Thank you,

Alissa Walker

\*\*\*

## Kayaking in my neighborhood

Under Fletcher





I'm having a lot of "I'd never thought I'd see the day" days lately in LA. Like the day I rode my bike on [15 car-free miles of Venice Boulevard to the ocean](#), for example. Or the day when I saw the Expo Line bridges going up in West LA.

And then there was yesterday, when I went kayaking in my neighborhood.

For the first time in 80 years, the Glendale Narrows section of the Los Angeles River is [opened to recreation as part of a pilot program](#). Meaning you'll see people boating down this 2.5 mile soft-bottom stretch of the river—which is also officially open for fishing, hiking, and bird-watching—until September 2.

You'll remember last year I [kayaked another section of the LA River](#), way up in the Valley, above the Sepulveda Dam. That section could only support a few trips a week, meaning that every tour was guided and sold out almost instantly. Here, many outfitters will run trips, but you don't have to wait for a tour. If you have a watercraft you can steer—we saw people on inflatable kayaks, canoes, paddleboards—you can ride. No tubing, which was a disappointment to this Missouri native.

I was surprised how many people, including people biking and walking along the river path, had no idea this was happening. Which is why this is really important (besides being REALLY FUN). Touring the Sepulveda Basin was fantastic but kind of a hidden secret, tucked away in a big park in a far-off corner of the city. This part of the river is so visible that you can see it from the Fletcher Bridge as well as a few different freeways. With the bike path so heavily used, plus so many people who actually live along the way, this is going to be the place that's going to truly transform the way Angelenos see their river.

Although we were certainly not the first people ever to kayak this section—see the documentary film [Rock the Boat](#), where a group kayaked the entire length of the LA River to prove it was navigable—we were definitely enough of a novelty to create a verifiable media blitz at Marsh Park, about a mile from our put-in. Our group was even featured [live on ABC7 news](#).

When I headed down to the press conference yesterday morning I was dismayed that none of the outfitters were renting boats on-site. The rangers let us paddle around in one of their kayaks for a few minutes, which was very nice of them (and why you'll see us in multiple kayaks in the photos), but I really wanted to do the entire 2.5-mile stretch. As luck would have it, I happened to meet a few folks from [LA River Kayak Safari](#), run by [two Elysian Valley residents](#), who were heading out on a friends and family preview trip that very afternoon. \$65 later, I was up by Fletcher Drive, strapping on a helmet and life vest and climbing into a hard-shell, sit-on-top kayak. I especially loved their tour because after we kayaked to the end, they met us with beach cruisers (ahem, river cruisers) and we rode the bike path back to the put-in. Brilliant. **Update:** [LA River Expeditions](#) has also added tours.

Now, wait, I know what you're thinking. Isn't the beauty of this new section opening that you *don't* need a guide, and you can just order up a kayak from Sport Chalet and be on your way? Well, yes, and no. Unlike the narrow, mellow, lazy river-esque Sepulveda Dam section, this part of the LA River is

wide, rocky and a bit gnarly. Along most of the route the water is only calf-deep, but the river is fast and deep in a few spots and I'd say half of our group took unexpected swims. I felt totally comfortable the entire time but I was still happy to be following someone the first time who knew the way (even though we did end up taking a wrong turn once—not a huge deal for me but a little harrowing for some, who ended up picking up their kayaks and walking back upriver to the correct route). If you do go on your own, be sure to [download the map and guide](#) that shows you how to use the numbers painted along the bank to navigate. I would definitely wear a helmet due to the slippery rocks and shallow water. And unless they've got experience, kids should probably stick to one of the pools, like the one we're paddling in on the news.

You may have wandered down to the river before, but being ON the river here is such a completely different experience. The water is cool and clear and fun to walk around in. This area is much cleaner than the Sepulveda Basin—maybe thanks to the awesome LA River cleanup day last weekend—and once you're down there it feels much more untouched by humans, despite being in a more urbanized area. For the most part it's just gravel and rocks and trees. And birds. So many birds! I saw a snowy egret snatch a giant fish from behind a rock, and watched a blue heron as it flew right over my head, with a wingspan that was easily as wide as the length of my kayak.

It's not a perfect riparian adventure. Since we ended up scooting over *lots* of rocks, the river could really use a bit more water (Army Corps of Engineers, is that something you can regulate?). In some places the concrete walls coming down into the water created a bleak artificiality, kind of like the manufactured landscape of a theme park ride. A few times, the roar of the 5 was a little overbearing (the Metrolink flying by was another story; I loved that sound). And there's not nearly enough infrastructure: a better beach for launching would be much appreciated, and the walls are kind of steep and treacherous to carry your boat up and down. In fact, some services overall would be nice; there are port-a-potties in Marsh Park but I'm not sure if they're permanent. Someone could make bank selling water, sunblock and snacks at the put-in. There also needs to be a beer garden at the end. Or a [Garlic Mike's](#). I'm going to work on that one.

But these are small complaints about a huge step in the right direction. As one of our enthusiastic fellow kayakers put it, "We're pioneers." And that's exactly how I felt, often all by myself, with no one else in sight, carving my way through a yet-again totally different city.

**From:** [Kartichoke@aol.com](mailto:Kartichoke@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] From Kay Ward and Friends  
**Date:** Sunday, October 13, 2013 5:46:16 PM

---

We support the proposal of Friends of the Los Angeles River. Please support them too.

Kay Ward  
Ronald Hummel  
and Friends

**From:** [Tim Warner](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support alternative 20!  
**Date:** Tuesday, November 05, 2013 1:23:59 PM

---

Hello,

I am a Los Angeles resident that lives near the river. I along with my wife and kids walk and bike along the river quite a bit. I fully support alternative 20 and hope the Army Corps. of Engineers opts to pursue that option.

Thanks,

Tim Warner

**From:** [chris watts](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Thursday, October 17, 2013 6:40:39 PM

---

I know it ain't cheap, but I gotta go with ALternative 20 for the LA river restoration!

Thanks for listening,

CSW

**Chris Watts**

1858 North Avenue 53  
Los Angeles, CA 90042  
**main** 323-333-5000  
**fax** 206-350-0064  
**skype** cswatts  
**aim** cwfx1  
**yahoo** cwiphone  
**dot•mac** csw  
<http://imdb.com/name/nm0915121/>  
**www.bake.org**

**From:** [Weisman William](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20 is the best option  
**Date:** Sunday, November 17, 2013 11:57:01 AM

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My husband and I urge you to choose Alternative 20. Of all the options in the US Army Corps of Engineers Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Alternative 20 is the most comprehensive. We believe it is important to include the Verdugo Wash in the project to provide as much restored riparian habitat for wildlife regeneration as possible.

With ever increasing human population pressures on the environment, it is vital to preserve, create, and maintain as much open space as possible to improve the urban quality of life.

Thank you for your consideration of our opinions,

Sharon and Bill Weisman  
5001 Carolyn Way  
Glendale, CA

**From:** [Carolyn West](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Monday, September 30, 2013 2:50:14 PM

---

My family supports Alternative 20 for LA River.  
This adds Verdugo Wash area.

Signed: Carolyn West and  
David Petzold

1621 Rancho Ave., Glendale, CA 91201 (818) 500-8208



**From:** [Field, Thomas J \(Jay\) SPL](#) on behalf of [SPL, PublicAffairs SPL](#)  
**To:** [Skopect, Kristen SPL](#)  
**Subject:** FW: [EXTERNAL] Los Angeles District Contact Form: LA River Ecosystem Restoration Issue (UNCLASSIFIED)  
**Date:** Monday, October 21, 2013 10:12:30 AM

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-----Original Message-----

From: noreply@dma.mil [mailto:noreply@dma.mil]  
Sent: Friday, October 18, 2013 4:47 PM  
To: SPL, PublicAffairs SPL  
Subject: [EXTERNAL] Los Angeles District Contact Form: LA River Ecosystem Restoration Issue

This message was sent from the Los Angeles District website.

Message From: Carolyn West  
Email: mjpcomacho@yahoo.com  
Response requested: No

Message:

I am trying to understand the proposals for areas adjacent to my residence (on Rancho Ave., just north of River between Western Ave & east end of Rancho Ave.)

1. You refer to "Right Side" of River in a description. What is right side? It would make alot more sense to call it north or south. Please let me know as it is hard to follow anything when I don't even know which side of the River to look at.
2. Where is the widening that is planned under Alt. 20 for my area?
3. LA Rec & Parks just spent about a million dollars on Bette Davis Park (west end). They killed the grass and put in mulch along the south side of the park here. You have a diagram that looks like you want to tear out the mulch and put in shrubs? Please advise.
4. How to the horse trails in this area fit into the plan? There are horse trails running along the north side of the river and along the south side of 134 in this general area. Do you have anything right now that I can review related to the horse trails?

From: [Carolyn West](#)  
To: [SPL Comments LA River Study](#)  
Date: Monday, November 18, 2013 3:02:36 PM

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Earlier, after the River Meeting I attended last month, I sent in a couple of requests for data from Army Corps, at the email address that they provided for that purpose. No attempt was ever made to contact me or provide the data requested. How am I supposed to clearly see a plan that is so tiny and looks little better with a magnifier. The information given to work with is not complete, unclear, etc. Descriptions are abbreviated and not complete.

1

A huge problem is that all this planning has been done without any involvement or consultation with the neighbors who happen to live next to the river. I live as close as anyone. It is just a short walk out my door, across a narrow strip of grass and horse trail, and I am at the river. I live on Rancho Avenue (91201). This is complete disregard. It means that your whole planning process has to be rated "F".

2

It is very hard to make out the plans and diagrams, having never been sent the enlargement with details covering the area near my house. But it appears that there is an area near the Riverside Drive Bridge where they plan to tear out the angled concrete wall and put in a vertical (cliff) concrete wall where the south river bank is now. . They even plan to hang vines off it. Now I can walk right down to the edge of the river to sit and view birds. A cliff will require some massive barricade to keep people from falling down. The vegetation in the river will prevent this steep wall from being seen from the north river bank. It appears that widening the river foot print a bit might only be to allow boats? That will bother the birds, no matter what time of year. Birders are out here all year long. This stretch of the River with natural bottom (both sides of Riverside Dr. Bridge west to where the concrete bottom starts) needs to be left natural for the birds and wildlife.

3

4

I like the idea of enhancing the Verdugo Wash area, but know nothing of the design specifics.

5

I want to know how the river plan is going to mesh / dovetail with the work that is already scheduled on the Riverside Drive Bridge and the new Bike Path from Riverside Drive Bridge west to Universal City???? (NBC Universal is financing the bike path work, to the best of my knowledge.)

6

It looks like you plan to do a bunch of landscaping in the Bette Davis Park area to the west / northwest of the Riverside Drive Bridge. How does this mesh / dovetail with the 2 years of work in the same location that was just recently completed by LA Rec & Parks???? Also, how does the horse trail fit into this? I am in favor of some more landscaping along the sides of the horse trail because it has become a major dust problem in our area. There used to be more native plants along the side of it and in the middle of it, But,several years ago it was all bulldozed by Rec & Parks just prior to a big horse show (in Sept) when a couple dozen horse trailers were parked on the horse trail. The dust and dirt becomes airborne and ends up in our yards. It also causes breathing problems for those of us that are dust sensitive.

7

Our area is posted for West Nile Virus and has been on an on-going basis. Vector control finds infected mosquitos here. We also have a MAJOR PROBLEM here with rodents, specifically rats and ground squirrels. I object to putting in any hanging vines - this will just be a rat nest and rat breeding haven and mosquitos will thrive. Those of us living around here see that mosquitos hang around in vines, damp vines, etc. The fact that there are alot of horses around here contributes to the rat problem. Also the fact that we are in Griffith Park wildlands.

8

I REQUEST THAT ANOTHER MEETING BE HELD FOR CONCERNED PARTIES AFTER THE ABOVE QUESTIONS ARE ANSWERED AND MATERIAL PROVIDED TO ME.

1

When I asked for info, in included my phone numbers. I go no emails, no phone calls, nothing.

I am out at the river on a daily basis and nothing can be done there without having an effect on my daily life and quality of life. I would like to have improvement, not permanent set backs. How can you call a massive concrete cliff "user friendly."

3

You have not provided anything that allows true understanding of the plans - especially the option 20 that everyone seems to want.

1

You need to consider the residents that live a short ways from the river and what their opinions are.

The preceding opinions are intended for the person to whom addressed only.

This email is not for resending, duplication, printing, or related.

*Sent by: Carolyn West, Member Glendale Rancho Neighborhood Association*

**From:** [Carolyn West](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] RIVER COMMENTS  
**Date:** Monday, November 18, 2013 3:38:39 PM

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You need to consult with LA Rec & Parks maintenance manager for Griffith Park (Michael J. Watkins) prior to doing landscaping, etc. that will impact the area that he is maintaining.

**From:** [lacyadjuster@yahoo.com](mailto:lacyadjuster@yahoo.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] I support Alternative 20 for the LA River  
**Date:** Tuesday, October 29, 2013 2:11:59 PM

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Thank you,

Janis L Weston

Sent from Windows Mail

**From:** [todd wexman](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River  
**Date:** Saturday, November 16, 2013 12:10:40 PM

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I am writing to express my support of Option 20 for the revitalization of th LA River. This effort will benefit huge areas of the Los Angeles for generations to come in a City which has few parks and minimal access to natural habitat. Given the huge impact, it is essential we make the most improvements possible.

Thanks,

Todd

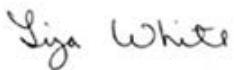
Todd Wexman  
926 Tularosa Drive  
Los Angeles, CA 90026  
310/770-6211  
twexman@gmail.com

**From:** [Liza White](#)  
**To:** [SPL Comments LA River Study](#); [councilmember.ofarrell@lacity.org](mailto:councilmember.ofarrell@lacity.org)  
**Subject:** [EXTERNAL] USCE LA River Feasibility Study  
**Date:** Monday, September 30, 2013 11:59:53 AM  
**Attachments:** [PastedGraphic-1.tiff](#)

---

I have lived in Los Angeles all my life and followed the long history of our river's environmental decline and possible revitalization. I have read the Executive Summary of the Feasibility Study. Although it recommends plan 13 (ACE) I would suggest that Plan 20 (RIVER) be the plan chosen. This is Los Angeles' once in an era chance to integrate environmental benefits to the most communities within the ARBOR area while achieving significantly more redevelopment, long term benefits.

I hope those who make this decision recognize that we won't be revisiting these possibilities again. We need to make bold decisions in a timely way.



Liza White  
908 Malcolm Ave. LA, CA 90024  
310 441-4461 h  
310 709-2101 c



**From:** [wilhelmnick@aol.com](mailto:wilhelmnick@aol.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] ALTERNATIVE 20  
**Date:** Sunday, November 17, 2013 2:31:10 PM

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Dear JOSEPHINE AXT, Chief,Planning Div.

I support Alternative 20 because it most completely insures natural habitat restoration. A richer human community experience will develop with the more comprehensive and connected plan.

Natural habitats will gain from the greater spacial and structural plans involved in alternative 20. The extra financial output will deliver exponential value to the urban community by providing expanded and healthful interactions amongst humans and other natural communities.

The L.A. River long been seen myopically as a flood control drain. It is time to fully expand vision and provide human and natural communities the fullest healthful options. The extra expenses will offer compounded natural and human social returns.

We need the urban experience to be softened by nature and an expanded conceptual leadership.

Respectfully yours,

Nicholas J. Wilhelm  
500 Cornell Drive  
Burbank, Ca. 915004

**From:** [Ed Wilson](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Los Angeles River Ecosystem Restoration Feasibility Study - In support of Alternative #20  
**Date:** Wednesday, October 16, 2013 9:18:06 AM

---

I am a resident of Pasadena, California. I am also a Board Certified Environmental Scientist. I have reviewed the USACE Draft document and would like to submit my support in favor of Alternative #20.

Please do not hesitate to contact me with questions or for more information.

Ed Wilson  
818 585-0700

**From:** [LA River Annex](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Question about LA River Study  
**Date:** Wednesday, October 02, 2013 12:31:11 PM

---

Hello,  
I listened to the KCRW interview where Josephine Axt was a speaker. She did a very good job with the short time she had explaining Alt 13 of the LA River Study.

I have a quick question regarding future generations use of the River Study before I submit a formal comment and post on my blog to get others to comment too.

Let's say Alt 13 is chosen and Congress oks it and Alt 13 is put into process and completed, and say in 30 years a new generation wants to restore parts of the LA River that were not in Alt 13 but were covered in the Study, say for instance covered in Alt 16 or Alt 20, Can that generation just refer to this LA River Study and restore the river covered in Alt 20 or do they have to spend millions more dollars and tens more years in doing a new study and a new approval process?

Thank you for your time it is greatly appreciated.

Sincerely,  
Kim Wolfe  
[lariverannex.com](http://lariverannex.com)



**From:** [partwolff@yahoo.com](mailto:partwolff@yahoo.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] LA River restoration  
**Date:** Tuesday, September 17, 2013 7:32:35 PM

---

Alternative 20 sounds like the preferable restoration plan. It includes more areas, and the terracing of the river's banks sounds much more natural.

Pat Wolff  
1020 El Sur Ave  
Arcadia, CA 91006  
[partwolff@yahoo.com](mailto:partwolff@yahoo.com)

- "The best whisper is a click." (google it!)

**From:** [Anja Stadelmann](#)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] Alternative 20  
**Date:** Thursday, October 17, 2013 5:41:35 PM

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Please consider Alternative 20 as an option for the Los Angeles River. Los Angeles is such a sprawling cement desert that we desperately need a large, green recreational space. This would be a bold, forward looking move and not just a little fix.

Thank you,

Anja Stadelmann Wright  
LA, CA 90068

John N. Yonai  
2616 East 3<sup>rd</sup> Street  
Los Angeles, California 90033  
626-665-1224

Yonai
-------

November 18, 2013

Josephine R. Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Attn L Ms. Erin Jones, CESPL-PD-RN  
Los Angeles California 90053-2325  
E-mail: [comments.lariverstudy@usace.army.mil](mailto:comments.lariverstudy@usace.army.mil)

**Re:** Support Letter for ARBOR Study Alternative 20

Dear Dr. Josephine Axt:

As a resident of the City of Los Angeles Basin I urge the United States Army Corps of Engineers to select Alternative 20, which would best restore the natural ecosystem habitat of the river area that directly impacts the quality of life of the Northeast Los Angeles riverfront communities of Atwater Village, Cypress Park, Elysian Valley, Glassell Park, and Lincoln Heights.

The proposed expansive ecosystem restoration described in Alternative 20 is essential to Los Angeles and provides:

- the best case scenario for a riverfront ecosystem habitat that benefits the green space for the poor communities of NELA;
- provides four (4) times more jobs than the other proposed alternatives within the ARBOR study to assist in addressing many of the local concerns;
- the greatest value to the immediate NELA region of over 330,000 residents that not only includes the riverfront communities but spans other L.A. neighborhoods and neighboring cities in the region such as Glendale, Burbank, and Pasadena;
- greater river access to the entire Los Angeles County region of 10 million residents who will have access to a valuable regional resource;
- an extremely cost effective investment relative to the impact to the region and population base as compared to other Army Corp projects.

I would like to encourage the ARBOR study document to insert language about the investment that the Federal government and City of Los Angeles is making in the ARBOR Study Area that is directly situated in Northeast Los Angeles. One of the goals for the future Northeast Los Angeles Riverfront District is to maintain and sustain the last 15 years of Los Angeles River revitalization efforts and ensure that the adjacent riverfront neighborhoods co-benefit alongside the revitalization of the L.A. River.

The Arbor study demonstrates the Army Corps commitment that the Corps and the Federal government have to Los Angeles's urban waterways and watershed. I recommend that that the most expansive option, Alternative 20, be adopted. Alternative 20 will provide the most sustainable pathway that will ensure environmental, social, economic, and cultural benefits to the Northeast L.A. Riverfront communities and the entire L.A. City and County region.

John N. Yonai  
2616 East 3<sup>rd</sup> Street  
Los Angeles, California 90033  
626-665-1224

Yonai

I look forward, in the near future, to speaking with you personally and other representatives as to the significant benefits that Alternative 20 brings to the future of Southern California, Los Angeles Basin, City of Los Angeles and the future NorthEast Los Angeles RiverFront District.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Yonai", is positioned above the printed name.

John Yonai



**From:** [Jennifer Young](#)  
**To:** [SPL Comments LA River Study](#)  
**Cc:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org)  
**Subject:** [EXTERNAL] LA River comment & question  
**Date:** Sunday, November 17, 2013 8:16:45 PM

---

Dear Sir or Madam,

I fully support alternative 20. Alternative 20 will make the city of Los Angeles a more valuable city, greatly increase it's beauty, make it a healthier city, and increase recreation and wildlife habitat. Alternative 20 has the furthest reach and will make the biggest difference of all of the alternatives. Alternative 20 the only alternative that makes sense to me.

However, I do have one question that I'm curious about in regards to all of the alternatives. As you know, when it rains there is a tremendous amount of water that gets dumped into the Pacific ocean. Since Los Angeles is a city that is very much dependent on water from outside sources, such as the Owens river, it seems like it would make sense to do everything we possibly can to be able to reclaim as much of the water as possible instead of dumping it into the ocean. Especially since Los Angeles will only grow larger and it's need for water will increase. I don't see any plan for water reclamation in any of the alternatives. Did I miss something? Is there any plan in any of the alternatives to reclaim this water?

Your reply is very much appreciated.

Respectfully,

Jennifer Young  
m: 323.646.7002

**From:** [karen Zaide](#)  
**To:** [SPL Comments LA River Study](#)  
**Date:** Monday, November 18, 2013 4:31:59 PM

---

To whom it may concern,  
Please choose alternative 20 because as a resident of Los Angeles county I believe that the environment is very important for our community.

[Sent from Yahoo Mail for iPhone](#)

**From:** [jennifer@zolaland.com](mailto:jennifer@zolaland.com)  
**To:** [SPL Comments LA River Study](#)  
**Subject:** [EXTERNAL] support of alt 20.  
**Date:** Monday, November 18, 2013 3:41:15 PM

---

Dear Ms. Axt,

Please support Alternative 20 of the LA River Ecosystem Restoration Feasibility Study. Restoring the natural hydrologic functions and habitat connections in the Arroyo Seco, the Verdugo Wash, and the main stem of the River from Piggyback Yard through the Glendale Narrows will be a commendable step toward achieving the Corp's primary mission for the Civil Works Program. Thank you for your leadership and vision in working toward positive change in Southern California.

Best regards,  
Jennifer Zell, ASLA  
Principal

**ZoLA**

ZELL OFFICE OF LANDSCAPE ARCHITECTURE

[P] 562.668.0251

[E] [JENNIFER@ZOLALAND.com](mailto:JENNIFER@ZOLALAND.com)

[W] [www.ZOLALAND.com](http://www.ZOLALAND.com)

Public Hearing in the Matter of: )  
 )  
LOS ANGELES RIVER ECOSYSTEM )  
RESTORATION FEASIBILITY STUDY )  
\_\_\_\_\_ )

Thursday, October 17, 2013

Job No. :  
CC635ROB

CITY OF LOS ANGELES

## RESTORATION FEASIBILITY STUDY

TRANSCRIPT OF PROCEEDINGS, taken at  
L.A. River Center and Gardens Atrium,  
570 West Avenue 26, Los Angeles, California,  
commencing at 5:35 p.m. on Thursday,  
October 17, 2013, heard before the  
U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES  
DISTRICT, AND CITY OF LOS ANGELES, reported by  
MARCENA M. MUNGUIA, CSR No. 10420, a Certified  
Shorthand Reporter in and for the State of  
California.

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1 Los Angeles, California, Thursday, October 17, 2013

2 5:35 p.m.

3  
4  
5 COL. COLLOTON: Unless there are any objections, I  
6 think we're going to get ready to start. Time is  
7 precious and I know we said we're going to start at 5:30  
8 and it's 5:35 or 1735 military time, so we're going to  
9 try and keep to the agenda. We have a lot of people here  
10 today that I know we all collectively appreciate you  
11 taking the time out to be here to be a participant in  
12 this public meeting process.

13 So a couple of things: One, welcome tonight,  
14 ladies and gentlemen. I appreciate your time. I'm  
15 Kimberly Colloton, the Commander of the Los Angeles  
16 District for the Army Corps of Engineers and as I said,  
17 you know, we collectively thank all of you for coming out  
18 tonight.

19 I just want to let you know that we have  
20 representatives tonight here from Congressman Becerra's  
21 office, Congressman Schiff's office, Congresswoman  
22 Roybal-Allard's office. We have Councilman O'Farrell,  
23 Councilman Cedillo, former Councilman Reyes, and we have  
24 Councilman Huizar represented by one of his staff members  
25 here as well.

1           The Mayor is on his way. He's running a few  
2 minutes late. We're going to be flexible and accommodate  
3 him into the introductions when he arrives.

4           But before I continue, before we kind of start  
5 with the official part of tonight's presentation, I just  
6 want to make a few logistical announcements.

7           One, if you are near anyone that can only speak  
8 Spanish, if you can raise your hand, let them know we do  
9 have translation devices. We have a few of them that  
10 will give live translation. So if there's anybody in the  
11 back or anyone anywhere that you know that would like a  
12 translation device, if that would be easier, we have that  
13 available. Raise your hand. There's a few people that  
14 will take notice and make sure that you guys have that  
15 available to you. Don't hesitate. We definitely have  
16 the capability.

17          Second, I just want to let you know for -- the  
18 room is crowded, which is great. Emergency exits are in  
19 the back and off to my right, your left. So directly in  
20 the back and off to my right, your left. If you go  
21 through the kitchen, there's only one door, but there is  
22 an exit through the kitchen as well.

23          Bathrooms are to the rear and to my left, your  
24 right. This may go on for a little while. Please feel  
25 free to go up and use the restroom if you need to. Don't

1 get uncomfortable. We want everybody to be comfortable  
2 and we want everybody to patiently wait as we give  
3 everyone that would like an opportunity or a chance to  
4 speak tonight.

5           You, the public, have a very important role in  
6 the National Environmental Policy, the NEPA process, the  
7 NEPA Act process. The purpose of tonight's meeting is to  
8 enable the exchange of information in two ways. One is  
9 for us to deliver information to you on the Los Angeles  
10 River Ecosystem Restoration Feasibility Study and, two,  
11 the second purpose, is for us to actively -- and I stress  
12 actively -- listen to anyone wishing to make a comment on  
13 this study.

14           And for your knowledge, we are videotaping  
15 tonight's public hearing and we also are LiveStreaming  
16 this meeting to those members of the public that couldn't  
17 be here in person.

18           We will not be able to answer all of your  
19 questions tonight, but I want to ensure you that we  
20 understand it's our responsibility to take into  
21 consideration all comments that we receive from this  
22 public meeting and during the entire public comment  
23 period, which extends until November 18th, and ensure  
24 that all of those questions and comments are addressed in  
25 the final report.

1           This meeting tonight, it's not a rally and it's  
2 not a competition and so I ask you to please be  
3 respectful of everyone that comes up here to the podium  
4 tonight, to the microphone to speak. Everyone's comment  
5 is important and we would like everyone to have a chance  
6 to be heard.

7           Again, tonight's purpose is to gather those  
8 public comments, your comments about all the  
9 alternatives, and enable us to make an informed final  
10 recommendation to Congress.

11           Developing a project like this that combines  
12 existing flood risk, management infrastructure that  
13 increases habitat restoration and enhances recreation  
14 benefits in a highly urbanized 11-mile stretch of the  
15 Los Angeles River is complex and requires innovative and  
16 thoughtful solutions, and I think we've done that and I  
17 think you'll see that.

18           Tonight's presentation will discuss how the  
19 Study's Draft Report details four alternatives named 10,  
20 13, 16 and 20 in addition to a No-Action Alternative.  
21 We'll also explain rationale for selecting a Tentatively  
22 Selected Plan.

23           In addition to providing verbal comments  
24 tonight, you also can comment via regular mail or e-mail.  
25 There are a number of comment cards in the back. Most of

1 you have already received those. If you'd like to make a  
2 comment and if you haven't, we still have more comment  
3 cards in the back. You can grab one. They're numbered  
4 and you will be called up to make your comment.

5 As our nonFederal co-sponsor of this study, I'd  
6 also like to warmly welcome the City of Los Angeles. As  
7 I mentioned, Mayor Garcetti is due to arrive, but we have  
8 Councilmembers O'Farrell and Cedillo here tonight and all  
9 of them, all of the City and the Councilmembers will make  
10 a few -- or the Mayor and the Councilmembers are going to  
11 make a few comments before we begin.

12 The Corps of Engineers, we're very proud of our  
13 partnership that we have formed with the City of  
14 Los Angeles and the entire room that's filled with  
15 involved and engaged stakeholders on this Study.

16 And so without further ado, I'd like  
17 Councilman O'Farrell -- would you like to get up and  
18 speak or Councilman Cedillo?

19 COUNCILMAN CEDILLO: Let me thank everybody and  
20 welcome you to the First District, through your  
21 Councilmember.

22 I am very excited to see you here this  
23 afternoon. This is an incredible opportunity for us as a  
24 community to come together to support this project. Let  
25 me say first I want to thank the Colonel and I want to



1    thank the Army Corps of Engineers. This is a critical  
2    project and I want to thank all of you who are here  
3    tonight because what I see here is what I will conclude  
4    with, but I want to say what I see here right now.

5            I see something that is very rare in politics.  
6    I see a consensus. I see a group of people who have come  
7    together around our hopes and aspirations to restore and  
8    revitalize the River, and that cannot be overstated.  
9    There is nothing more important for us economically and  
10   for the acquisition and expansion of green space than to  
11   do this project and to do it right.

12           We appreciate the proposals that have been  
13   brought forth. We appreciate your consideration, but I  
14   have to say to you that for us and for you on behalf of  
15   me and my colleague, we are enthusiastic; and he is  
16   really enthusiastic about Option 20. We will be very  
17   clear about that. We are not shy or modest to put forth  
18   where our position is.

19           And we believe that as we saw earlier, this type  
20   of governing coalition that has emerged with this type of  
21   popular support can help us resolve any of the other  
22   issues that exist. We just believe that. Our life  
23   experiences tell us that.

24           Now, I have been involved in some issues that  
25   seemed insurmountable in the past. Some said it was not

1 realistic to try to save the health care system in 1995.  
2 They said, "Gil Cedillo, you're just a union leader. How  
3 do you think you're going to save the hospital system?"  
4 But we did it. People thought, Well, you know, this  
5 Dream Act, you're going to give scholarships to young  
6 people who aren't here legally? But we did it.

7 Now we just saw the other day, after 20 years,  
8 we reversed wrong-thought policy. We reversed a change  
9 in our environment with better policy, a more thoughtful  
10 policy, when we voted a decision to give licenses to  
11 immigrants. People said it couldn't be done, yet we did  
12 it and I thank you and I say to you -- and I mention  
13 those three things because there is a common theme in  
14 each instance. Some people thought it wasn't realistic.  
15 Some people thought it wasn't viable. Some people  
16 thought we couldn't afford it. Some people thought it  
17 was bad policy; but ultimately, and even in the case of  
18 the driver's license where there was so much opposition,  
19 so much opposition, we came to a point -- we came to that  
20 tipping point where we developed a consensus.

21 So I say here to you tonight that we are at that  
22 point, that tipping point, with my colleague, with the  
23 colleagues who were here earlier, but with you here  
24 sitting in this audience, we have this incredible  
25 opportunity to express to the Corps of -- the Army Corps

1 of Engineers that we are at that tipping point, that we  
2 have come to that consensus that we have the body of  
3 governments, that we have the popular support, the  
4 science and technology exists, the vision of  
5 Lewis MacAdams. We are at that point where we can go  
6 from vision, right, to from what's desirable to this  
7 moment of what is doable and this vision now can become a  
8 reality. And so we are at that point tonight and so I  
9 want to thank you for being here.

10 I will say to you, as we know, this is a great  
11 source of new green space and it flows through the  
12 nation's largest urban region. We know that. The River  
13 is home to more than a million people. A quarter of the  
14 city's population have proximate access to the River.  
15 390,000 units of housing, 480,000 workers and 35  
16 businesses are all proximate to the River. There is  
17 hardly anything more urgent nor anything more timely.

18 This is what they would say an idea whose time  
19 has come. All right. No force of nature nor army can  
20 stop an idea whose time has come and so that's where we  
21 are at tonight. I applaud you because this is where we  
22 are at tonight.

23 I don't want to talk about the alternatives, and  
24 I'll tell you why. 16 years in the Legislature and six  
25 years as a CEO, I always tell my staff, "Focus on where

1 we want to go." Let others talk about, Well, you know,  
2 maybe there's 13. Cedillo, what do you think? I'm not a  
3 negotiator. I promise you that. Even though I've  
4 negotiated many big deals, I always focus on where we  
5 want to go because if we stay focused, Lewis, as you've  
6 taught us, on where we want to go, then we're going to  
7 get there. We're going to get there closer and closer  
8 and closer.

9 We'll start with what's doable. Always focus on  
10 what's desirable, but when we come to this point tonight  
11 where we're so united, where we have this incredible  
12 consensus, there is no really, as I would say, no force  
13 of nature or army that can stop us from realizing this  
14 idea whose time has come.

15 I want to thank you for being here tonight. I'm  
16 going to stop now and I'm going to just say to you thank  
17 you. I know my staff works so hard giving me talking  
18 points and they think I don't use them. I read them  
19 earlier. I'm not going to read them, but I'm just going  
20 to say seldom in my political experience, and it's been a  
21 very rich one, have I been in a room where people are so  
22 committed to this idea, an idea of a visionary, an idea  
23 that can bring people together, an idea that can move us  
24 forward. Rarely do we have those opportunities in life.

25 At this moment, this time I say to you is that

1 time, the time for an idea whose time has come. I thank  
2 you and I look forward to joining you on Alternative 20.

3 Thank you so much. God bless you.

4 COL. COLLOTON: I'm happy to announce I'd like to  
5 turn it over to our sponsor, the head, the City, the  
6 Mayor, Mayor Garcetti.

7 MAYOR GARCETTI: Thank you, Colonel. Thank you.

8 First of all, let me thank Councilmember  
9 O'Farrell for letting me go next. I appreciate it.

10 Thank you, Councilman Cedillo, for your words.

11 It's the difference between getting home and  
12 getting to see a 2-year-old before she goes to bed, and I  
13 used to walk along the L.A. River with my father and it's  
14 certainly an experience I look forward to having with my  
15 daughter, if we do this right.

16 And I am so overwhelmed with emotion to be here  
17 with all of you who -- what a journey that has been for  
18 so long for so many of us. In this space, a creative  
19 writing teacher in high school that I had named Lewis  
20 MacAdams who helped unleash the poetry of this place for  
21 me, the history that swirls around us because  
22 Los Angeleans were not meeting talking about what to do  
23 with the coastline.

24 Los Angeles was founded here because of two  
25 rivers that intersected just down the street from us, a

1 place where native Gabrielenos came for years, the Tongva  
2 who were here, and then when Father Juan Crespi came in  
3 1769 and wrote in his journal about the two earthquakes  
4 that visited him the day that he took communion in the  
5 River at the intersection of the Arroyo Seco and the  
6 Los Angeles River, they christened the name of this place  
7 because of the water around us. It was a "Rio de Nuestra  
8 Senora la Reina de los Angeles de la Porciuncula" because  
9 of the day of St. Francis of Assisi, the Franciscans, the  
10 beauty reminded him of that small piece of land next to  
11 the church in Assisi where St. Francis went to when he  
12 needed to find peace and solace and to recharge.

13 Well, that is our River today, just as it has  
14 been our River yesterday and it will be our River  
15 tomorrow. But I want to thank the Army Corps of  
16 Engineers, first of all, for letting a Navy guy speak and  
17 hopefully listening to me with no prejudice despite our  
18 many victories in our Navy games over the last decade.  
19 But more importantly, this Army Corps of Engineers has  
20 always answered this city's call.

21 The call has changed over time, but when we  
22 rejected a parks plan ourselves because everybody had a  
23 backyard and we didn't feel a need to build great public  
24 parks and then we had a flood that killed our people in  
25 this city, we went to the Army Corps and we asked for

1     their help and they were there. And now three-quarters  
2     of a century later, we come back to that same great  
3     institution, the Army Corps of Engineers, to thank them  
4     for joining us at this time, for the culture shift that  
5     was a part of us getting there, for Councilmembers  
6     Cedillo and O'Farrell, for all of us who have worked on  
7     it from the community, who have realized that this is an  
8     opportunity of a lifetime, one shot to do this and to do  
9     it right.

10           And we now have over 4,500 people in Los Angeles  
11     who have signed a petition. I can't remember the last  
12     time 4,500 people in Los Angeles agreed on anything but  
13     who have said that we want to make sure Option 20 is the  
14     one that we enact on the banks of our founding River.

15           In 2006 when we approached the Army Corps of  
16     Engineers, it was an exciting moment. We had done our  
17     work in the City through so many community meetings to  
18     put a Master Plan together; and plans are great, but we  
19     were determined not to have it be the newest Olmstead  
20     plan that goes on a shelf never to be opened or enacted.  
21     We wanted this to be a living, breathing blueprint; and  
22     after seven years of study and community engagement, the  
23     Corps released the four proposals that we know for the  
24     River last month.

25           As Mayor, I have made it clear from the



1 beginning and to Washington that 20 is what this Mayor  
2 will lead and propose and support; and hopefully this  
3 entire City through our strength will show unified,  
4 exhaustive, detailed work that has taken us to this  
5 point; that we as a donor state who give a dollar and get  
6 back only about 70-something cents from Washington are  
7 asking to cash that check and to say that those deposits  
8 that we have made for decades, that it's time for us to  
9 do something that is going to be great not just for our  
10 city but for our nation.

11           So let us not be pennywise and pound foolish.  
12 Let us not enact something that makes us feel that we  
13 have done something but we've lost the ability to do  
14 everything. And we know, by the way, this is -- you  
15 know, when you have four options and it probably comes as  
16 no surprise, "Well, folks, you just want the most  
17 expensive." It's not. We would actually like something  
18 more expansive than even 20, but 20 is the best option in  
19 the report that we have and it's a start. And we know,  
20 too, that we don't come hat in hand to Washington. We  
21 have said that we will step up and we will find the  
22 resources to be a partner, a majority stakeholder in  
23 this.

24           You know, we've done that in transportation when  
25 we've taxed ourselves to build out rail lines now. We've

1   done that in water when we taxed ourselves with Prop O.  
2   We have realized that our destiny has to be controlled by  
3   us, but we also look forward to an amazing partnership  
4   that we can have with the Federal government with  
5   Alternative 20. It's the only alternative that equitably  
6   shares costs. It will generate up to four times more  
7   jobs, and jobs is my number priority as your Mayor.  
8   Alternative 20 will also bring the most open space for  
9   park-poor communities, and this has to be about  
10  environmental justice as well as reclaiming a river.

11           So I know that our friends at the Army Corps  
12  were as frustrated as us the last couple of weeks when  
13  little was going on in Washington. I was to meet with  
14  the head of the Army Corps of Engineers and he could not  
15  travel because of the dysfunction that we see at the  
16  national level among politicians; but at the local level,  
17  there is no dysfunction. We're unified. There's one  
18  team here and we are united and vocal in pushing for  
19  Alternative 20.

20           I want to thank two partners in Washington who  
21  have been extraordinary: Senator Barbara Boxer and  
22  Congress Member Roybal-Allard for their unwavering  
23  support for this.

24           And you can see from the list that's still  
25  scrolling I've been reaching out to Angelenos, too, so

1     that we can send a huge message to our Army Corps of  
2     Engineers because just like I am your Mayor and this is  
3     our city, they are our Army Corps of Engineers that we  
4     should be so proud of; that in this official comment  
5     period, there isn't division in the city of Los Angeles.  
6     This city of angels is united.

7             So I'm going to ask you to do something else  
8     right now. If you haven't signed the petition, pull out  
9     your phone. You can do it right now. And tell your  
10    contacts, even if you have signed -- text somebody right  
11    now to go to "lamayor.org/restore\_the\_la\_river." There  
12    are spaces in between, underscore.

13            But just as the L.A. River is part of a larger  
14    watershed, restoring the River is a critical part of  
15    moving our city forward. New life on the River will be  
16    new life to our city, to the neighborhoods and the  
17    businesses around, and you've heard me talk about my  
18    back-to-basics agenda. There is nothing more basic than  
19    that river that has borne us, the Los Angeles River.

20            So thank you all. Let us win this. I promise  
21    you that this discussion and this battle will go on not  
22    just from Los Angeles but hopefully from a unified voice.  
23    I plan to travel to Washington, D.C.

24            I was just sharing with the Colonel that I  
25    haven't called in any favors really from our incredible

1 President, but many of you know I was one of the first or  
2 second people in the state to back him. I was very proud  
3 to travel to 13 or 14 states to campaign for him, but you  
4 can bet I'm going to call this one in and I'm going to go  
5 straight to, because we can approve this. But to be  
6 clear, the Army Corps of Engineers can sign off on 20,  
7 which I hope and pray that they do. It will be a legacy  
8 to remember for them to take their children along the  
9 banks of this revitalized river, but that doesn't get us  
10 there because then we need funds and it happens in two  
11 ways: from Congress, and we'll keep up that  
12 Congressional pressure, and from the OMB, which is on the  
13 Executive Branch.

14 So we're going to be taking this message to  
15 them, making sure that Los Angeles gets its dessert, and  
16 that this country will see a truly great river reborne  
17 again.

18 Thank you all for coming.

19 COL. COLLOTON: Thank you, Mr. Mayor.

20 And Councilman O'Farrell, if you could please  
21 come up.

22 COUNCILMAN O'FARRELL: So I'm supposed to wax poetic  
23 after that? Not going to happen.

24 No. I want to welcome Colonel Kim Colloton.  
25 She is relatively new to the scene, yes, not unlike my

1 Colleague Gil Cedillo and myself on the City Council and  
2 the Mayor.

3 Folks, we have a new team of enthusiasts at the  
4 River. We've gone from the abstract in the last 20 years  
5 or so into the very real, the very present effort, the  
6 unified effort to demand nothing less than the  
7 alternative that has been the result of so much  
8 diligence, so much professionalism, so much investment  
9 over the last several years.

10 One of the giants in the room is Lewis MacAdams.  
11 He's been mentioned, yes, Lewis MacAdams.

12 I am such a blessed man. I have the mentorship  
13 from being on staff of the man you just heard, and that  
14 is Mayor Eric Garcetti, who was Councilmember back in  
15 2002, when he took a chance and hired me and I was at the  
16 very first meeting of the Ad Hoc River Committee chaired  
17 by Councilman Ed Reyes, who is sitting here tonight.

18 We had mentoring while on staff from the  
19 masters, Eric Garcetti, Ed Reyes, Tom Labonge, and now my  
20 friend and colleague Gil Cedillo, who has done so much  
21 work at the State level. We're in such good hands and  
22 I'm going to be brief because you all need to speak and  
23 we'll hear your points and it will be part of the public  
24 comment and in this hearing.

25 But earlier, we held a press conference and

1   there were nine elected officials representing City,  
2   State, and Federal level and this region is speaking in  
3   one voice.  Alternative 20 is the way to go.  We all know  
4   that.  And as the Colonel said, this isn't a rally.  You  
5   all will make quality statements that will justify  
6   further beyond what has already been said, but this is  
7   just one step in the process.  We're in this for the long  
8   haul.  We're all determined.

9           We are uniform in our intent to see this full  
10   vision realized.  It's 11 miles, 11 miles of the  
11   Los Angeles River that will bring quality-of-life  
12   enhancements to a great plurality of Angelenos living and  
13   working in their neighborhoods, but it will create more  
14   of a destination place so that people across the city,  
15   across the region, can enjoy the restored ecosystems and  
16   riparian habitat that the founders of our city enjoyed.

17           We can do this right.  We will do this the right  
18   way.  This will be a watershed moment -- and you know  
19   there are going to be metaphors tonight I'm sure,  
20   intentional or otherwise -- and this is going to be  
21   another improvement, yet another improvement that will  
22   bring Los Angeles into the world-class status that we are  
23   deserving.

24           So thank you all for being here tonight and it's  
25   a real pleasure to serve you on the City Council.  Thank

1     you.

2           COL. COLLOTON:   Last, from Councilman Huizar's staff,  
3     Martin would like to get up and make a quick statement.

4           MR. SCHLAGER:   Thank you very much.   Martin Schlager  
5     representing Councilman Jose Huizar.

6           I appreciate everyone who's here, but thank you  
7     so much to the Army Corps and Colonel for being here to  
8     hear these comments.

9           I'm really representing the unity of the city.  
10    The city is unified in support for Alternative 20.   The  
11    Councilman's district, which covers most of the downtown  
12    area of the River, wants really to highlight here for the  
13    Army Corps today that if we're not able to move beyond  
14    Alternative 13, we're losing an opportunity to connect  
15    the east side of our River to nature and that underscores  
16    part of the value of the Ecosystem Restoration Study as a  
17    whole, and that is to bring the connection of nature back  
18    to a very urban area, an urban area where the environment  
19    has been so fractured over time that we need to reconnect  
20    so we're reconnecting the communities in the densely  
21    urban area but also the ecosystem and that's another area  
22    in which we must move to Alternative 20, to maximize the  
23    productivity of these ecosystem areas, to truly have  
24    restoration along the L.A. River for a sustainable  
25    habitat restoration plan.



1           And we want to thank you for how far you've come  
2   in the past few years in working through this study. It  
3   is a turning point here. The opportunity now is to make  
4   sure that we embrace the most visionary plan so that this  
5   long-term project -- none of this is going to be done  
6   overnight -- this long term project has the agreement of  
7   the State and the County and the Federal government along  
8   with the City to be able to achieve long-term plans. And  
9   it's under Alternative 20 that we allow ourselves the  
10  most options for future restoration and the most benefit  
11  to the most people from restoration of the L.A. River.

12           Thank you so much.

13           COL. COLLOTON: Thank you. And now we're going to  
14  start the official presentation where we're going to  
15  deliver the information. It's about a 20-minute  
16  presentation. It's Going to be delivered to you by  
17  Drs. Axt and Armstrong. Dr. Axt is from the Corps of  
18  Engineers and Dr. Armstrong is from the City of  
19  Los Angeles and jointly they're going to present to you  
20  everything we talked about, everything you heard about,  
21  maybe you've read about it, and then after that we'll  
22  start the public comment period.

23           DR. AXT: Good evening, everybody. It's a pleasure  
24  for me to be here. My role tonight is to quickly give  
25  you an overview of how we got to where we are, the

1 framework that we had to work within, and the differences  
2 among the alternatives. I'm afraid I am going to have to  
3 speak to alternatives other than just 20. I'm going to  
4 go through all of them.

5 Any Corps study starts off with establishing  
6 planning objectives and in this case we had three primary  
7 ones: To restore habitat, to increase connectivity, and  
8 to provide passive recreation.

9 So in terms of the first objective, Restore  
10 Valley Foothill Riparian and Freshwater Marsh Habitat,  
11 what you're seeing in the upper right of the slide is our  
12 11-mile study area and that's from about the  
13 Equestrian Center north of Griffith Park to downtown.  
14 And on the left here, this is what -- how the habitats  
15 were mapped in 1896, and I won't go through all the  
16 different colors. Basically, it represents the diversity  
17 of natural habitat types that used to exist along the  
18 River.

19 What you see here (indicating) is that same area  
20 in the present day with the red representing urbanized,  
21 developed land.

22 So basically, the point is we've lost the  
23 habitat and our first primary objective was to restore  
24 some of that diversity of habitat that used to exist  
25 along the L.A. River. When you lose habitat, you also

1 lose biodiversity and ecological processes that go along  
2 with them.

3 And our second objective, Increase Habitat  
4 Connectivity, has got two aspects to it. There's the  
5 regional aspect, and this graphic on the lower left shows  
6 you our 11-mile study area in the context of some  
7 nationally significant ecological areas, San Gabriel  
8 Mountains, Santa Susana Mountains, Santa Monica  
9 Mountains, and the point here is that the 11-mile stretch  
10 really serves as a bridge, as a backbone, regionally to  
11 connect those areas. And also, there's the aspect of  
12 connection that relates to how within a river, the river  
13 itself connects to its floodplains. So the river's then  
14 channelized and we know it provides flood protection, but  
15 what we lost was that natural hydrology and when you lose  
16 the connection of the river to its floodplains, you lose  
17 out on processes like nutrient cycling and sediment  
18 transports. So those aspects are also encompassed in the  
19 second objective.

20 Now, our third objective is Passive Recreation  
21 and the important thing to remember there is this is  
22 recreation that's compatible with a restored environment  
23 and "passive" simply means nonmotorized, low-impact type,  
24 hiking, biking, bird watching. And that objective we  
25 really independently justified and analyzed after we

1 selected the Tentatively Selected Plans. So I'll go into  
2 that more later.

3 Briefly, Corps usually doesn't get going on a  
4 Study until it has authorization. So in this case, we  
5 had committee language in '69 that allowed us to partner  
6 with the City and start the reconnaissance phase in 2003.

7 We then began a feasibility phase in 2006.  
8 That's what we're trying to wrap up right now. Of  
9 particular note in terms of study authorization is the  
10 idea that in 2007, the Water Resources Development Act  
11 specifically had language in it directed at the ongoing  
12 study which said, you know, Be consistent with the goals  
13 of the Los Angeles River Revitalization Master Plan  
14 effort.

15 And the Mayor and others mentioned this. Many  
16 of you are probably aware it was an extensive outreach  
17 effort led by the City, lots of public meetings trying to  
18 get the citizens' vision for what they wanted the River  
19 to look like. So the Corps was directed to make use of  
20 that.

21 One brief additional thing on study area: We  
22 often get the question, "Why are you looking at just that  
23 11-mile stretch?" So originally there's 32 miles of the  
24 River that flow through the city of L.A. We chose this  
25 11-mile stretch, which, again, as the squiggles in the

1 previous slide here, we have the Equestrian Center,  
2 Griffith Park, and going down to downtown. This 11-mile  
3 stretch not only had that regional context that I  
4 mentioned, but also has -- approximately half of the  
5 channel is still soft bottom. It's not encased in  
6 concrete, so there's existing habitat patches that we can  
7 connect and then again, you know, the floodplain  
8 connection as well. But that was the reason that we  
9 chose this 11-mile stretch, and that consensus really  
10 emerged in about 2008 to focus on this area.

11 Okay. I think we know what the problems are  
12 real quickly. You know, loss of aquatic habitat, lack of  
13 river processes, lack of connectivity. It's hard to see  
14 that the River is even in this picture (indicating)  
15 because of everything else going on. We've got highly  
16 altered flows, high-velocity flows. So you have channels  
17 that look like this, a tributary that maybe used to be  
18 meandering. Now the water's going straight and fast.

19 The middle photo is illustrating lack of  
20 substrate and natural sedimentation, although as I was  
21 saying, there are some soft-bottom areas along the River  
22 and there is habitat there that's widely used, but in a  
23 lot of instances native plants have been displaced by  
24 nonnative species.

25 And then in terms of impervious surface and

1 urban runoff and pollution, you know, we have a rain  
2 event and whatever is on the streets or in the gutters  
3 ends up in the River so you get trash as well.

4 And the last thing, again, recreation, we  
5 have -- and the photo on the left shows you areas where  
6 people can go along the River channel, but there's not as  
7 much access to the River, and that's what we are hearing  
8 loud and clear, that people would like that.

9 So briefly, in terms of -- you know, the flip  
10 side of problems is opportunities, so our major objective  
11 is to restore habitat types that used to exist along the  
12 River that maybe used to look like that (indicating).  
13 And the bullets you're seeing here are some of the key  
14 characteristics of the habitat type we're trying to  
15 restore. It's linear, it's running along the River, it's  
16 flow-dependent. We're in an area where you've got kind  
17 of a rainy season and a dry season and the vegetation has  
18 adapted to those conditions, those variable conditions.

19 The sharp contrast bullet here is just  
20 emphasizing you could have a very arid upland, very close  
21 to that ribbon of green that's where the water is. The  
22 diverse structure is given that you ecologically want to  
23 have diversity of niches for wildlife to use. So if you  
24 have shrubs and trees and grasses, then that's more  
25 positive than a monotypic situation. And because it's

1 linear, you connect habitat areas and that serves as  
2 wildlife corridors and that's what's illustrated here  
3 (indicating). And this is straight out of the  
4 Revitalization Master Plan where it was looking at,  
5 again, some of those significant areas for wildlife and  
6 how we could try to connect those nodes. And the blue  
7 area, again, is our study area.

8 Really quickly, we worked within a framework of  
9 constraints and considerations. So two important  
10 constraints I need to mention is that where practicable,  
11 we wanted to avoid areas along the River that were  
12 contaminated; and because many of the parcels along the  
13 L.A. River and the stretch known as the ARBOR --  
14 Alternative with Restoration Benefits and Opportunities  
15 for Revitalization -- that ARBOR really is an acronym for  
16 that. Many of those parcels had industrial uses in their  
17 past and there's either some contamination there or a  
18 perception of contamination.

19 So in our case, we really couldn't avoid areas  
20 that were contaminated and the note here is just under  
21 Corps Restoration Policy, we're not allowed to cost share  
22 the remediation or cleanup of parcels. The City  
23 provides -- or the sponsor, the City -- provides the  
24 lands necessary for the project and they need to be  
25 provided in a state so that they're ready to be restored.



1           The other constraint I wanted to emphasize was  
2   our baseline conditions we took to be the existing flood  
3   risk management benefits that are provided by the  
4   channels, so I think everybody's aware of why they were  
5   built and the importance of them. When we put together  
6   our restoration measures and brainstormed and came up  
7   with alternatives that I'll get to in a second, we were  
8   always working within the context that anything we're  
9   proposing couldn't increase flood risk for the citizens  
10   next to the River using the existing flood risk  
11   protection as our baselines.

12           Other considerations quickly were just there's  
13   not a lot of water there. We don't want to be proposing  
14   habitat or vegetation that needs more water than what's  
15   going to be in the River, which is largely from the  
16   water -- Tillman Treatment Plant. The photo illustrates  
17   what a lot of us know. There's infrastructure all over  
18   the place, so we had to be cognizant of that.

19           Limited availability of land and limited  
20   recreation gets that the recreation that we're proposing  
21   needs to be on study land. And the study land, you know,  
22   we had to be -- we were targeting public-owned parcels in  
23   terms of acquiring land for the project. There was a  
24   limit of that. And we wanted to be cognizant of cultural  
25   and historic sites when we're planning as well.

1           So one last restoration challenge before we get  
2 into the alternatives. I just wanted to make the point  
3 when I first started more than five years ago at L.A.  
4 District and I would say "L.A. River Restoration," people  
5 were like, "Great, all the concrete's going to be gone"  
6 and that's not possible. We need that concrete and it's  
7 providing some good flood-risk benefits and I just wanted  
8 to illustrate this graphic on the top left.

9           So the channel is on average about 300 feet  
10 wide. If you wanted to take away all the concrete and  
11 maintain your flood protection, your channel would need  
12 to be like 900 feet wide if you just had grasses in it.  
13 If you wanted the same level of protection but you wanted  
14 to allow some trees and shrubs in there, you need to have  
15 it five times as wide as it is now.

16           So early on in the planning phase, you know,  
17 this black line here around the L.A. River in the study  
18 area, that band is basically showing you a 1500-foot-wide  
19 swath of area that we would have to remove the businesses  
20 and roads and houses that were there if we really wanted  
21 to remove all the concrete. So that's why we were not  
22 able to do that. The real estate alone was over  
23 7 billion dollars if you wanted to pursue that.

24           Another idea that we had, we are the Corps of  
25 Engineers after all, and we thought wouldn't it be great

1 to have some big tunnels going under the city and we  
2 could take the high flows off the River.

3 We're limited in what we can do in the channel  
4 because we have to be cognizant that we do get big storms  
5 and the water can come through very quickly, very fast,  
6 and it can rip out what we're putting in. So in addition  
7 to the flood risk, we have to be cognizant of what we're  
8 putting in. We don't want high O and M costs or to have  
9 it all be destroyed, but if we took those high flows off,  
10 if you have a big event and you had a big tunnel and you  
11 could literally have the water move off the River, then  
12 you could do whatever you wanted in the River because  
13 there would be no safety risks or flooding risks. But  
14 again, doing that had a lot of technical constraints and  
15 was more than 3 billion dollars for just the tunnels. So  
16 that again was an alternative that we had to discard.

17 So I want to go over this figure (indicating)  
18 and try to explain it to people because it is a key piece  
19 of how we evaluate plans. So if you will all bear with  
20 me, I'm going to describe to you -- you're looking at two  
21 figures -- oops, no, you're not -- and on the X axis, we  
22 have Average Annual Habitat Units.

23 So a habitat doesn't have a dollar value. You  
24 have to assign. You have to use a metric to evaluate the  
25 habitat and our Habitat Units look at the size and the

1 quality and the functioning of what we're putting in and  
2 we get a Habitat Unit for that, and that's our  
3 restoration output, if you will. And on the left axis,  
4 the Incremental Cost per Unit. So how much does it cost  
5 to get that unit of output? And in this case, we're  
6 looking at the incremental costs from one unit to the  
7 other.

8           And so this bar basically -- this is  
9 Alternative 10 -- well, let me step back. The inset  
10 figure is set up the exact same way with outputs on the  
11 bottom and costs on the left and these are our 21 Best  
12 Buy Plans. So we did a lot of environmental work,  
13 engineering. We had planning charrettes, and I'm going  
14 to show you some of what we came up with when we get to  
15 the alternatives. We mixed and matched them and we had a  
16 graph here that shows you how they compare to one another  
17 in terms of their output and cost. So people may have  
18 wondered, Why is it 10, 13, 16 and 20? And that's  
19 because they came from our initial 21 Best Buy Plans and  
20 in Corps lingo, "Best Buy" means cost-effective,  
21 incrementally justified, and here you see the yellow ones  
22 are where the -- the yellow are the four that we pulled  
23 out of that initial graph and put in our final array,  
24 because they occurred at natural break points in terms of  
25 cost and output.

1           And down here (indicating) so here are our four  
2 alternatives. In Alternative 10, basically the wider  
3 width shows that you're getting a lot of output and it's  
4 a short bar graph. So that means you're getting all that  
5 output for not very much increase in cost, and then red  
6 shows you're getting incrementally some more output for a  
7 certain incremental cost; and as you go up, your  
8 incremental costs get higher.

9           One analogy we thought of was if you were going  
10 to the 100th floor of a building to look out and see the  
11 view, maybe the first 80 floors you could get to those 80  
12 floors for \$40. You know, buy your ticket. So every  
13 floor would cost you fifty cents. But once you're to the  
14 80th floor, they're like, "Hey, you've got to pay 20 more  
15 dollars." So all of a sudden you're paying \$1 per floor  
16 to get to the top. I don't know if that analogy is  
17 helpful, but we thought it was when we were internally  
18 talking.

19           So that's kind of illustrating like to get to  
20 20, we're getting more outputs, but we're having to pay  
21 more incrementally to get them. So I will move on.

22           So now I want to describe briefly the key  
23 features of the four alternatives. So we couldn't show  
24 you everything we're doing in these alternatives on one  
25 graph. It's just too messy. You've got the detailed

1 report. But before I start showing you some of those  
2 bigger parcels, each of the alternatives does have a  
3 riparian corridor in all of the areas that you could  
4 really put one on the overbank parts of the different  
5 reaches.

6 And I should have mentioned earlier for planning  
7 purposes, we divided the 11-mile stretch into these eight  
8 reaches. So those are the different colors and that was  
9 based on the size and configuration of the channel and  
10 the land use around it and so we have -- what's not shown  
11 on this figure is a riparian corridor that's in all of  
12 the alternatives and the daylighted tributaries that's in  
13 the report. Those are sprinkled throughout the reaches.

14 But what we have in Alternative 10 is we have  
15 riparian habitat on the overbank in Pollywog Park and  
16 Bette Davis Park and those are colored in blue. So  
17 that's -- we're not changing the shape or size of the  
18 channel. This is restoration on the overbank, you know,  
19 not in the channel.

20 At the Griffith Park Golf Course and the Los Feliz  
21 Golf Course, that's where we have a side channel. We  
22 pull water out of the River, we take it into the  
23 overbank, we create habitat, and then we put it back in  
24 the River. Again, we're not removing concrete, per se,  
25 or changing the channel.

1 Taylor Yard in this alternative moves -- and  
2 that's where many of you know it's soft bottom already,  
3 and it moves the channel bank back 80 feet and increases  
4 the natural streambed area.

5 And in Piggyback Yard, our largest parcel, we  
6 don't change the configuration of the channel or the  
7 walls, but we restore an historic wash and we have a  
8 large area for wetland and freshwater marsh habitat.

9 And in that case, the water would flow from the historic  
10 wash and flow into the River through pipes that would go  
11 through the existing fill material and the culverts, and  
12 the walls.

13 So here are some pictures real quick from the  
14 report. This shows incorporation of passive restoration  
15 or passive recreation into habitat, structurally diverse  
16 habitat in Pollywog Park. A side channel at  
17 Griffith Park might look something like that (indicating)  
18 where you've got a shaded, meandering small stream.  
19 Riparian corridors that I was saying are in all of the  
20 alternatives, there would be nice green vegetation,  
21 different structure again. And this last photo shows the  
22 golf course side channel at Los Feliz. So you can't see  
23 it in this photo, the water would be taken off the  
24 channel, go through Los Feliz, and then go back into the  
25 channel.



1           Okay. Alternative 13: The main thing to say  
2 here is that everything in Alternative 10 is also in  
3 Alternative 13, plus we have side channels at  
4 Ferraro Fields and that's again where you take water off  
5 the River, bring it through the area, create some  
6 habitat -- there's a wetland at the end -- and then put  
7 the water back in.

8           We have Taylor Yard. And what's different about  
9 this Taylor Yard is that instead of going back 80 feet,  
10 the banks are pulled back 300 feet, so you have increased  
11 amount of habitat that's created. And then Arroyo Seco  
12 is added in Alternative 13 and this is where we do have  
13 concrete removed from the channel bed and from the  
14 channel walls.

15           And so here's pictures of some of this. It's  
16 probably important to note the side channel at  
17 Ferraro Fields does not interfere with soccer. It goes  
18 along here and underneath (indicating) and then there's  
19 the wetland right there.

20           The L.A. River at Taylor Yard, that's the iconic  
21 photo that's on the cover of the report and so you see  
22 all of this space is just considered by many to be a gem  
23 along the River because it's such a big parcel and would  
24 allow such a nice interaction of the floodplain with the  
25 River.

1           And then the Arroyo Seco Confluence, here you've  
2   got that removal of concrete I was mentioning. You've  
3   got a type of terracing going on and diverse little  
4   stream running into the L.A. River. The position of the  
5   pictures, you're looking downstream towards the L.A.  
6   River.

7           And I know I'm talking fast. I'm trying to get  
8   through all of this so we can get your comments.

9           Alternative 16 has everything in Alternative 10  
10   and Alternative 13 as well as -- oh, I'm supposed to turn  
11   it over. I was on a roll.

12          Okay. There you go.

13          DR. ARMSTRONG: Thank you. Really, let's hear it for  
14   the Army Corps of Engineers. This is big stuff.

15          I'm Carol. I'm with the City of Los Angeles and  
16   we're honored to have been the local sponsor of this  
17   study that has now been going on for seven years. I want  
18   to thank all of you and congratulate all of you who are  
19   in the room and watching streaming. I know the study  
20   manager's at home in Phoenix watching us.

21          Hi, Kathy Bergmann. You're a champ.

22          Congratulations to the Corps for getting us to  
23   this point.

24          And we have -- we still have a long way to go,  
25   but, man, do we have a great blueprint moving forward and

1 I'm going to talk about that.

2 So here's Alternative 16. Alternative 16 builds  
3 on Alternative 13 and it does that by doing terracing in  
4 Reach 5. That's roughly from Los Feliz to Fletcher.  
5 This is a concept that was developed in the City's Master  
6 Plan; therefore, it's very consistent.

7 What it does is it allows access for humans and  
8 wildlife and creates that habitat connectivity upstream  
9 to downstream and it helps us get closer to achieving  
10 objective one in the study for riparian and marsh  
11 habitat, and particularly I want to mention down here  
12 Piggyback Yard, the 125-acre rail yard. We would acquire  
13 that. But in Alternative 16, it would be the first one  
14 where you would connect it to the River, and that's  
15 exciting. That would look like this (indicating).

16 Okay. So the terracing: Again, this is an  
17 image from the Master Plan. You still have concrete in  
18 the channel, but you're allowing access for wildlife and  
19 people, those upstream-to-downstream connections, and  
20 here at Piggyback Yard, you would have soft bottom almost  
21 a mile long. It's about three-quarters of a mile  
22 soft-bottom stretch of the River in downtown Los Angeles.  
23 Ready? I'm going to say it again. You would have  
24 three-quarters of a mile of soft bottom in the River in  
25 downtown Los Angeles.

1           Okay. Now I want to talk to you about a little  
2 alternative called 20. Yeah.

3           Okay. Alternative 20 is the most expansive in  
4 the study and the most expensive, but, wow, is it the  
5 most exciting. I want everybody to understand that when  
6 this project is authorized, we're not going to ask for  
7 500 million dollars in one day. It's going to be  
8 appropriated in phases over time as the City's local  
9 sponsor is able to work with its partners to acquire  
10 lands and clean them up and deliver them to the project.

11           So what you see is that Alternative 20 is the  
12 only one that's going to directly benefit the other  
13 cities, the cities of Burbank and Glendale. It's going  
14 to restore the confluence of the Verdugo Wash. That is  
15 vague. The Verdugo Wash is an important confluence that  
16 connects up to the Verdugo Hills. It also provides  
17 important future connections between Griffith Park and  
18 the Verdugo Hills so that P-22, the mountain lion here,  
19 can actually start to date. So that's where the  
20 Verdugo Wash confluence is. It also importantly is the  
21 first one that would connect the L.A. State Historic  
22 Park, the former cornfield site, to the River.

23           As you know, there's a long history with the  
24 L.A. State Historic Park and the cornfields. That was  
25 supposed to be industrial warehouses and the community

1 fought long and hard for that to be a park. It was then  
2 acquired by public agencies and now it's a State park.  
3 So this Federal investment would leverage that State  
4 investment in creating a western connection, a riparian  
5 hydrological connection to the Elysian Hills.

6 That only happens in Alternative 20 and this is  
7 what it would look like (indicating). This is the  
8 terracing concept again that comes from the City's Master  
9 Plan. This is what the Verdugo Wash confluence  
10 restoration would look like and that's what the  
11 cornfields connection would look like.

12 Now I want to point out that the City's Master  
13 Plan had five primary opportunity areas. Alternative 20  
14 would restore three of those five. So that is a high  
15 level of consistency with the City's Master Plan as well.

16 Yay. Go team. I'm going to turn it back to my  
17 river sister Josephine. Thank you.

18 DR. AXT: Carol offered me an Alternative 20 button,  
19 but I had to decline.

20 Okay. So now we're going to look at a quick  
21 comparison of the final array of alternatives. So I  
22 won't go through the key features added. We just did  
23 that.

24 Here it gives you a sense of the cost, so  
25 Alternative 10 at 375 million going up to Alternative 20

1 at a little over one billion. This column shows you the  
2 Federal versus nonFederal sponsor cost-share percentages,  
3 and I need to let everybody know that usually the Corps  
4 Ecosystem Restoration Authority is 65 percent Federal  
5 cost sharing and 35 percent nonFederal; and in this case,  
6 the lands are so expensive in urban Los Angeles and  
7 nonFederal sponsors are per Corps authority and  
8 mission -- sorry -- guidance, they're responsible for  
9 providing the lands. So that's why we have a skewed cost  
10 share, because the lands are such a big part of the total  
11 project cost and the Corps itself doesn't provide the  
12 lands.

13 So as the construction costs become higher in  
14 Alternatives 16 and 20, then the ratio there becomes  
15 closer to 50-50 and you can see it's lowest in 10 and is  
16 about 30 versus 70 percent in Alternative 13.

17 This column shows you restored acreage. You can  
18 get a sense of the magnitude of acres we're talking about  
19 and here are those Habitat Units. Again, you can get a  
20 sense of how many we have and then as costs go up, how  
21 many more are added.

22 I'm going to briefly speak about some key points  
23 of the alternatives in the context of the Corps's  
24 framework for decision making.

25 So we have Federal criteria, completeness,

1 acceptability, efficiency, effectiveness. We have to  
2 look at the significance of the outputs. Are they very  
3 scarce? Are there endangered species involved? There's  
4 no right answer, per se, so obviously tonight the Corps  
5 as you all know is selecting Alternative 13 as the  
6 Tentatively Selected Plan and that's why we're here  
7 tonight, to get some public input on that acceptability  
8 piece and hear what you all want and think. But it's  
9 important to note that there's not not a right answer,  
10 per se. We don't use benefit-cost ratios.

11           So for Alternative 10 -- sorry -- it's the most  
12 efficient plan, going back to that figure. It minimally  
13 meets objectives. It was the first plan -- it became the  
14 first plan in our final array from the previous nine when  
15 I was showing you all 21 because it was the first plan  
16 that included the features in all reaches and that type  
17 of connectivity was an important objective of the study.

18           Alternative 13 regionally meets the objectives  
19 and it had the greatest increase in net benefits with the  
20 least increase in cost between the different  
21 alternatives, and reasonableness of cost is also part of  
22 that framework of decision making.

23           Alternative 16 meets our planning objectives and  
24 it provided contiguous restoration within and across  
25 reaches. So that's important in terms of the



1 connectivity objective and also it had additional  
2 regional connections. Alternative 20 maximizes our  
3 planning objectives and it was the only alternative, as  
4 Carol was just saying, with meaningful habitat links to  
5 Verdugo Hills and to Elysian Hills.

6 So in the context of all the different criteria  
7 I just mentioned and the significance of the outputs, the  
8 Corps came to the conclusion that Alternative 13 is what  
9 we call the National Ecosystem Restoration Plan, as it  
10 reasonably maximizes net benefits and so it's our  
11 Tentatively Selected Plan and that's why we're here  
12 tonight getting your input.

13 Briefly, before I turn the floor over, I'm going  
14 to go do a little bit more on cost and mention the  
15 Recreation Plan. As I said at the very first slide, that  
16 was independently formulated after the Tentatively  
17 Selected Plan was identified and we're looking at  
18 nonmotorized, low-impactful activities. So we're talking  
19 about multiuse trails, maybe bridges or crossings going  
20 over tributaries, maybe a pedestrian tunnel in  
21 Taylor Yard. So we want people to be able to get into  
22 the restored areas and enjoy it without disturbing what's  
23 been restored.

24 In terms of the total cost for again  
25 Alternative 13, our Tentatively Selected Plan,

1 453 million dollars, the Federal cost here, the  
2 31 percent, as I was saying before, are all construction  
3 because so much of the cost are a function of the real  
4 estate and land and utility relocations, et cetera, that  
5 is the responsibility of the nonFederal sponsor.

6 Recreation cost, that's separate from the  
7 453 million. I just want to emphasize the 453- is for  
8 the Restoration Project, so plus 6 million for the  
9 recreation, and that's cost shared 50-50 between the  
10 Federal and nonFederal sponsor. Benefit-cost ratio can  
11 be done in this case with recreation and we had a nice  
12 high one based on our estimate of recreation benefits.

13 In terms of next steps, we have a quality  
14 assurance process in the Corps of Engineers where we have  
15 nationally recognized experts come in and review what  
16 we've done. They're going to wrap up their report in the  
17 beginning of 2014. We're going to take all the comments  
18 we've already received and will receive from stakeholders  
19 and the public and we're going to get comments back from  
20 our higher headquarters and we're going to spend the next  
21 few months responding to those comments and relooking at  
22 the report and revising as appropriate so that our Final  
23 Integrated Feasibility Report is targeted for the spring.

24 We have an important milestone conference in  
25 D.C. called the Civil Works Review Board and that's where

1 the Corps as an agency makes its kind of formal decision,  
2 Yes, this is the plan that we want to recommend and get  
3 authorized, send to Congress.

4 After that milestone, we have State and Agency  
5 Review, what we call. Basically with the Final EIS and  
6 Integrated Report will go back on the street and you'll  
7 all be able to see the changes that have been made to the  
8 report. We'll then summarize that in what's called the  
9 Chief of Engineers' Report and that's what goes to  
10 Congress to get authorization, and then I just put, "Are  
11 we going to have a Water Resources Development Act in  
12 2014?"

13 So here's some information on making comments  
14 and I think at this point I'm all done and I turn it over  
15 to Chris.

16 MS. SKOPECK: Thanks, Josephine.

17 Jay, do you want to come up here for a second to  
18 help me? Good evening, everyone. I'm just going to go  
19 over some ground rules for the public comments portion of  
20 the meeting.

21 My name is Kristen Skopeck. I'm from the U.S.  
22 Army Corps of Engineers. I'll be facilitating the public  
23 comment portion. I'd like to review the ground rules for  
24 tonight's meeting, which are necessary in the interest of  
25 time.

1           Comment cards are available on the table and  
2   were offered to you as you came in. The cards with  
3   numbers on them are for people who wish to make a public  
4   comment. Those that are not numbered are for people who  
5   want to submit a written comment but do not wish to  
6   speak. Please note that there is an e-mail address on  
7   the cards so comments can be sent in electronically as  
8   well.

9           To keep things running smoothly, please line up  
10   for verbal comments at the microphone located in the  
11   middle of the aisle in consecutive order based on the  
12   number of the comment card. For example, numbers one  
13   through five should get in line and then subsequent  
14   numbers will keep the line formed.

15          Tonight's proceedings are being recorded, so all  
16   comments automatically become part of the public record.  
17   Individuals will limit comments to three minutes.

18          Please observe the lighted timer at the top of  
19   the podium -- actually, Jay's trying to figure that out  
20   right now -- which will display green for two minutes and  
21   45 seconds, then amber for 15 seconds, and turn red for  
22   five seconds to indicate your time is up.

23          Individuals who are speaking for an agency or  
24   organization will have six minutes. Please indicate that  
25   you fall into this category before you begin. Each

1 person should take just one turn at the microphone until  
2 everyone has had a chance to comment. If you do not use  
3 all of the time allotted during your turn, the remainder  
4 of the time can't be yielded to another person.

5 Those who wish to make a verbal comment will be  
6 asked to state their name for the public record. All  
7 comments should focus on the restoration feasibility  
8 study. Please note that the project team will not take  
9 time away from the comment section to answer questions,  
10 as responses to the comments will be part of the final  
11 report. However, if there's time at the end of the  
12 meeting, they're going to respond to comments that have  
13 been asked or questions that have been asked repeatedly.

14 If you require help or special accommodation,  
15 please see one of the Corps personnel located around the  
16 room. We all have name tags.

17 Okay. So let's start with the first comment.

18 Can number one please come forward and two and  
19 three and so on.

20 All righty. We're getting ready to start the  
21 timer, ma'am. Number one, please go.

22 MS. DODGE: My name is Marian Dodge.

23 Friends of Griffith Park supports Alternative 20  
24 because it is the most complete and most efficient of the  
25 alternatives.

1           Alternative 20 is the only one to restore the  
2 wetlands and connectivity at the Verdugo Wash. This is  
3 particularly important because of the discovery of  
4 mountain lion P-22 in Griffith Park. He needs the  
5 increased connectivity to cross the River and get into  
6 the national forest to find a mate or, as Carol put more  
7 succinctly, he needs to start dating.

8           Alternative 20 complements perfectly the  
9 National Park Service proposed Rim of the Valley  
10 Project, which actually was showed in one of your very  
11 first slides, sponsored by Congressman Adam Schiff. Rim  
12 of the Valley would link vast open spaces around  
13 Los Angeles, including Griffith Park and the Los Angeles  
14 River.

15           Friends of Griffith Park has also been working  
16 with the National Park Service to identify and enhance  
17 the historic 1775 Juan Bautista de Anza trail where it  
18 goes through Griffith Park. We have trouble convincing  
19 people that there really is a river there that the  
20 expedition followed in 1775. They don't get it. And  
21 having the restored wetlands at the Verdugo Wash with  
22 planted terraces along the river would greatly enhance  
23 the experience of hikers along the historic trail.

24           So with the combined connectivity for wildlife  
25 and your Federal agency working with the Federal agency

1 can combine Rim of the Valley and work with the Anza  
2 Historic Trail, Alternative 20, that's the win-win-win.

1

3 Thank you.

4 MS. SKOPECK: Right. If those farther down in the  
5 line don't want to stand the whole time, I understand.  
6 You know, if you just want to have five people or so,  
7 it's up to you.

8 Okay. It's not the easiest timer. Okay.

9 Go ahead, sir.

10 MR. LOPEZ: Good evening, everybody. My name is  
11 Humberto Lopez. I represent Los Angeles County offices  
12 of Education and pretty much I'm currently on their  
13 Policy Council and I'm their treasurer.

14 The reason why I came tonight was to thank the  
15 Mayor really personally because I believe it's a very  
16 important thing to fix that River.

17 For the most part, I just wanted to tell you a  
18 little bit about what I've been doing for the past two  
19 years. I've been advocating for early childhood  
20 education and for the most part, I got very involved with  
21 this sequestering and I was able to do a lot of things  
22 for the children and that's really why I'm here. It's  
23 about the children for me. It's the importance.

2

24 Everything that I have read is wonderful, but  
25 just to imagine that I'll be able to take so many Head

1 Start children out there for field trips and have  
2 festivals, just events throughout the year, it's almost  
3 like an outside convention. That's what I'm seeing and  
4 for the most part, I'd like to thank the Army Corps.  
5 Thank you so much. And for it really means a lot to me  
6 because this is my backyard and for the most part I'd  
7 like to thank all the men and women who are in public  
8 service.

9 So I just want to let you all know that I'm for  
10 Alternative 20. Thank you very much.

11 MS. SKOPECK: Thank you.

12 Person three, please.

13 MS. FRIEDMAN: I'm Laura Friedman and I'm a current  
14 councilmember and former Mayor of the City of Glendale.

15 I'm here tonight to speak on behalf of the  
16 200-plus residents -- 200-plus thousand residents of the  
17 city of Glendale to say that I believe that  
18 Alternative 20 is the only acceptable alternative to my  
19 city.

20 Now, we're going to be voting on a resolution  
21 for this in two weeks and I hope that all of the Glendale  
22 people who are here come to Council to advocate for that,  
23 but as far as I'm concerned, Alternative 20 with the  
24 restoration of the Verdugo Wash really helps to complete  
25 the L.A. River by linking it to its natural habitat to

2

3



1 the mountains to the east and to make it something that's  
2 not a piecemeal but a complete project.

3 The "Los Angeles" in "Los Angeles River" does  
4 not just refer to the city of Los Angeles. Los Angeles  
5 is a region and it's a county and this project is  
6 exciting and important to all of the people of the  
7 Los Angeles region and I know that many people that are  
8 here tonight are not just from the city of Los Angeles.  
9 We have people from Pasadena. We have people from  
10 Glendale. I hope we have people from Burbank. This  
11 touches all of us.

12 So the alternative that really reaches out to  
13 all of those residents and enfranchises them and brings  
14 them into this project is the appropriate alternative, so  
15 Alternative 20 because of its ecological impact, because  
16 of its reach to cities outside of just the city of  
17 Los Angeles, because I think that economically it gives  
18 you the most bang for your buck in terms of job creation,  
19 habitat restoration and just long-term planning is really  
20 the correct alternative.

21 I'm very much in support of that alternative. I  
22 think this is the most exciting project that I have seen  
23 since I've lived in Los Angeles County. It is -- the  
24 photos you were showing is an incredible vision and it's  
25 an incredible vision that can be a reality. I've been to

1 Korea and have seen what they did to their river in Seoul  
2 which had been buried by a highway and now it is the  
3 jewel and the centerpiece of that nation.

4 We have the opportunity to do the same thing  
5 here to make a statement about nature, about ecology, and  
6 about how we value our city and our region and our  
7 county. Let's do it together as a region. Let's make it  
8 something that's inclusive. Let's do it right.

9 Thank you very much.

10 MS. SKOPECK: Thank you. Number four.

11 MS. SMITH: Yes. My name is Kathleen Smith. I'm  
12 here tonight representing the Angeles Chapter of the  
13 Sierra Club, the Water Committee. I'm also a public  
14 health nurse and this is definitely a public health  
15 issue.

16 We support Alternative 20 as the best option to  
17 at least partially restore this degraded River.

18 Alternative 20 supports the fullest possible beneficial  
19 use of the current river flows and will definitely help  
20 with the filtration of stormwater and treatment plant  
21 discharges. I affirm and offer emphatic support for  
22 Alternative 20 from the Sierra Club.

23 Thank you.

24 MS. SKOPECK: Thank you.

25 We just would like to request those people in

3

4

1 the back to please keep the chatter down because it's  
2 difficult for us to hear so well. So thanks for that.

3 Number five?

4 DR. SCHNEIDER: Thank you. Good evening, officers  
5 and public. My name is Dr. Richard Schneider. I am the  
6 Mayor of the city of South Pasadena.

7 Now, my city sits along the Arroyo Seco, which  
8 is a tributary to the Los Angeles River, and we are very  
9 much in favor of and support and encourage Alternative 20  
10 because it is a step in the right direction for restoring  
11 the whole river system of this County. So thank you.

12 I won't repeat what other people said, but I  
13 certainly agree with them. Thank you very much.

14 MS. SKOPECK: Thanks.

15 MR. LINTON: Hello. My name is Joe Linton. I'm the  
16 author of the guidebook to the L.A. River called Down by  
17 the Los Angeles River and I am looking forward to you  
18 making my book completely obsolete with all kinds of new  
19 features along the River.

20 It's exciting to hear the Army Corps talking  
21 about daylighted tributaries. It warms my heart. And I  
22 want to echo what Mayor Garcetti was saying that I think  
23 that, you know, a billion dollars sounds like a lot of  
24 money here, but the Army Corps spent more than 5 billion  
25 of today -- in today's dollars solving the flood control

5

6

1 problem on the River but also really disconnecting the  
2 River from the communities that surround it and so I  
3 think this is really -- I want to appeal to the Army  
4 Corps, I want to guilt the Army Corps to say, This is  
5 your chance to revisit what was a really important  
6 project that you were very invested in and to do it right  
7 this time around. I want to say, Go big, go 20.

6

8 MS. SKOPECK: Thank you. Are we at number seven?

9 DR. WILLIAMS: Dr. Tom Williams, L.A. 32 Neighborhood  
10 Council, Sierra Club Water Committee. 20.

11 Do we need anything more? Yes. Actually, we'll  
12 be submitting comments to the River Study for the  
13 environmental process and the Feasibility Study.

14 There are some problems. I worked on the  
15 Redline Phase I and when you open the channel south of  
16 the Arroyo Seco, you're going to have real problems with  
17 the groundwater. There's also a matter that you should  
18 be aware, that there is a groundwater recharge project  
19 from the Department of Water and Power which will raise  
20 the base flow for all groundwater downstream. So we have  
21 some problems with it, but, hey, 20.

7

22 MS. SKOPECK: Thank you.

23 MR. MORGETTI: I'm a little tall for this mic.

24 MS. SKOPECK: Remind me what number we are, just so I  
25 can keep track.

1 MR. MORGETTI: I'm number eight and my name is Karen  
2 Morgetti (phonetic). I'm just a resident. I just moved  
3 to Glassell Park and fell in love with the neighborhood,  
4 and I bike and walk along the L.A. River. I live right  
5 by Taylor Yard so I was very excited to see that  
6 potential new park I guess.

7 So I just have two small comments. One is that  
8 I heard a small mention about access bridges crossing the  
9 railroad tracks, crossing the River. I just want to make  
10 sure that that is like a big part of the plan, that  
11 Griffith Park is easily reached by foot from the River  
12 and that the Rio Rancho Park, which is right by me, is  
13 also easily reached by foot. Right now it's very  
14 circuitous. Like to get there, you have to follow these  
15 secret paths, which is cool for me because I know about  
16 them, but most people don't.

17 Then my second point is just I'm from the East  
18 Coast. My parents live in New York City and for the  
19 people that doubt this sort of cost-benefit analysis,  
20 just look at the Highline and the Hudson River Park and  
21 just see how much -- you know, they spent millions and  
22 millions of dollars on both of those and that whole west  
23 side of Manhattan has been hugely -- just it's booming.  
24 The real estate has gone up and the commerce has  
25 benefited from that. So I think it's worth the

1 billion-dollar price tag. Thanks.

2 MS. SKOPECK: Thank you. Could you please hand your  
3 card to the gentleman in the white shirt.

4 We're going to -- thank you. We need to try to  
5 get those from the folks that have already spoke. Thank  
6 you.

7 Ma'am, number nine?

8 MS. MURPHY: Yes. I'm Deborah Murphy. I'm the  
9 Founder and Executive Director of Los Angeles Walks.  
10 We're a pedestrian advocacy organization.

11 As my scarf shows, the Los Angeles River is the  
12 life blood of Los Angeles and it has been so throughout  
13 its history. It is the opportunity through  
14 Alternative 20 to be the lifeblood of all the communities  
15 along the River that it runs through and hundreds of  
16 thousands of people live close enough to the River to  
17 walk to it, to walk along it, and it to be a part of the  
18 daily lives that they lead.

19 We need a more walkable Los Angeles and a more  
20 walkable Los Angeles River. Alternative 20 can help us  
21 get there.

22 I was in this room over 20 years ago with  
23 Lewis MacAdams, Arthur Golding, Ed Reyes, and others to  
24 look at opportunities and dreams for the Taylor Yard. We  
25 want to see that some of those dreams come true, that all

1 of the communities along the River have the opportunity  
2 to have great recreational opportunities and restore our  
3 habitat and make connections in our neighborhoods. We've  
4 come a long way and Alternative 20 will help us realize  
5 many of those dreams. Thank you so much.

9

6 MS. SKOPECK: Thank you. Ma'am, can you give us your  
7 card, please. Could we grab your card. Thank you.

8 Hi, sir. Number ten?

9 MR. GOLDING: I'm Arthur Golding. I'm a board member  
10 of the Council for Watershed Health. The Council has  
11 unanimously endorsed Alternative 20.

12 I'd like to speak briefly to two points. The  
13 first is habitat connectivity, which has been mentioned  
14 many times this evening. I'll draw your attention back  
15 to common ground from the mountains to the sea. The 2001  
16 report that looked at the double watershed of the L.A.  
17 and San Gabriel Rivers. It identified wildlife corridors  
18 as an important priority and the River corridors as the  
19 most important priority. While continuous habitat's the  
20 most effective, discontinuous patches of habitat also  
21 work very well for many species. So in that context,  
22 it's extremely important that the confluences of the  
23 tributaries with the main Los Angeles River be  
24 naturalized, be restored as habitat, because those are  
25 going to play key roles in the habitat connectivity.

10

1 I think it's also important to emphasize that as  
2 big as 11 miles is and as big as a billion dollars is,  
3 this is actually a very small proposal. It's only a  
4 first step. If we look at what habitat restoration means  
5 in this region, there are many, many opportunities  
6 upstream on all the tributaries, upstream and downstream  
7 on the main step. So while some are concerned with what  
8 they see as a large price tag, I think it's important to  
9 recognize that it's actually a pretty small one.

10 My second point might be a little unexpected.  
11 It's about climate change. And while habitat restoration  
12 is the main focus of this study, flood protection is of  
13 course a core mission of the Corps and it's also a core  
14 function of the river system and one of the things that's  
15 very interesting about the existing river system is that  
16 it's extremely inflexible. Those concrete channels are  
17 whatever size they are. If we begin to reconceive it and  
18 rebuild it with green infrastructure, we actually have  
19 the opportunity to increase our flood protection rather  
20 than simply maintain it; and in a year where climate  
21 change is upon us, where severe weather events are  
22 happening frequently and unpredictably, that kind of  
23 resiliency is something that people all over the country  
24 are looking for and something that we can build into our  
25 River by choosing the alternative that will begin to

10



1 maximize the open green spaces that will respond  
2 resiliently to climate events. Thank you.

3 MS. SKOPECK: Thank you, sir. May we have your card,  
4 please? Also, is anyone standing by the light switch?  
5 We'd like to turn the light switch on to see the panel  
6 members. No? Just thought I would ask.

7 Sir, number -- you're number 11; correct?

8 MR. JONES: Yeah, I am. I'm Andrew Jones.

9 My comment is basically a methodological point  
10 about the study. I think the best way to approach this  
11 is to -- kind of a theme that's been talked about again  
12 and again by different speakers are connections and the  
13 connections that are being made.

14 When you make connections between things that  
15 are not previously connected, you start to change the  
16 quality of the thing that you were looking at.

17 So let me just give an example comparing  
18 different cities. So you think about what makes a city  
19 kind of organically whole and distinctive. We can  
20 compare San Francisco to Los Angeles. San Francisco has  
21 Golden Gate Park. I'm a sociologist. My conference  
22 wants to go there, San Francisco, because it goes to  
23 three regions of the country. It wants to go to  
24 San Francisco. When it goes to the West Coast, it wants  
25 to go to San Francisco every time. Occasionally it will

11

1 go to L.A. but nobody likes it; and the question is  
2 there's a lot of value and virtue in L.A., but there's  
3 not enough connections in L.A. to kind of have it reach a  
4 critical mass, a tipping point. That's what Gil Cedillo  
5 was sort of mentioning. And that's the point that  
6 Malcolm Gladwell talks about in terms of tipping points;  
7 but when you reach a certain point, you reach a tipping  
8 point.

9 Now, directly to the methodology of the study,  
10 it's saying it's incremental cost per unit. So each unit  
11 is treated the same as every other unit. So if we have  
12 588 acres in Plan 13, then each additional acre is  
13 treated as the previous acre, but we know that things  
14 don't really work that way. When we get up to -- and I  
15 don't know what the break-off point is and I don't know  
16 if anybody does, but when we get up to 671 acres, perhaps  
17 we reach a tipping point where there's now wildlife  
18 corridors. So the additional unit that was calculated  
19 with this linear model, the additional unit, it depends  
20 on which additional unit it is. If it's the right  
21 additional unit, it reaches a tipping point.

22 I also want to say that the comparison of  
23 cities, if we're going to compare San Francisco to  
24 Los Angeles or New York to Los Angeles, the reason why  
25 people want to go to San Francisco is it's reached a kind

1 of aesthetic tipping point where people want to go to  
2 San Francisco because it is an integrated whole. Somehow  
3 the incremental changes have gotten to a point where  
4 there's been a tipping point.

11

5 L.A. has a potential to do that. This is a  
6 great city. It has a lot of -- it has great ecological  
7 values, but we need to draw those values out. And I know  
8 my time is up.

9 MS. SKOPECK: Thank you, sir. Number 12?

10 MR. CORTES: 16.

11 MS. SKOPECK: Oh, 16? Did I miss all those numbers?  
12 Is there anybody between 11 and 16? Okay.

13 MS. HIGGINS: Hi. Lila Higgins. I want to talk  
14 about two unrepresented audiences. I want to talk about  
15 insects and children. I'm an entomologist and an  
16 environment educator.

17 I grew up in England and I played along the  
18 River. It was my river, the River Severn, and then when  
19 I moved to Los Angeles, I quickly came to find the L.A.  
20 River and adopted it. It's very different than the river  
21 I grew up at though.

12

22 As an entomologist, I want to talk about my  
23 support of Alternative 20. Insects and other  
24 invertebrates are often overlooked for other more  
25 charismatic meiofauna; however, they are a crucial

1 backbone of a healthy ecosystem. By adopting  
2 Alternative 20, we can create more habitat for insects  
3 and, therefore, create a more healthy ecosystem that will  
4 support habitat for birds, fish, frogs, and many more  
5 creatures.

6 Scientists here in Los Angeles at the Natural  
7 History Museum have just begun studying the insects in  
8 Los Angeles through their bioscan projects and they're  
9 finding things that we never knew existed. We really  
10 don't have an idea of what insects live here in  
11 Los Angeles.

12 Dr. Brian Brown, an entomologist at the museum,  
13 is a world expert on phorid flies. In a backyard in  
14 Los Angeles, he found brand-new species of a phorid fly  
15 that never before had been discovered and there's more  
16 out there waiting.

17 Imagine how many species are out there for  
18 scientists to find and what if it was in one of the new  
19 parcels of land that we create habitat for insects?  
20 Imagine if we don't take that chance and we miss that  
21 opportunity.

22 As I mentioned before, I'm also an environmental  
23 educator. Here in Los Angeles, we don't have a lot of  
24 safe spaces for children to play and experience nature  
25 like I did when I was a kid growing up along the river,

12

1 especially not in riparian areas. Therefore, I'm fully  
2 in support of Alternative 20 which will create more park  
3 space for children to experience nature and for them to  
4 have amazing River experiences. Imagine what it will be  
5 like when children are able to play along the River, hear  
6 a frog call, chase a dragonfly, and splash in clean  
7 water. And indeed, if we don't provide those  
8 opportunities, where will our city be in 2050? 2100?  
9 And if we don't help the children get those experiences,  
10 they're not going to be able to take care of our city in  
11 the future.

12

12 MS. SKOPECK: Thank you. 14?

13 MR. APPLETON: I'm Steven Appleton. I'm a resident  
14 of Elysian Valley and I also led kayak tours down the  
15 L.A. River this summer, which was an amazing experience,  
16 and I'm also an artist who's been long inspired by the  
17 Los Angeles River.

18 I want to just talk very briefly about the  
19 community relationship to the River. So in Elysian  
20 Valley, which is my community, I met a gentleman this  
21 summer who as a young boy created a kayak out of plywood,  
22 he told me. He is now 84 and kayaked down the L.A.  
23 River. And there are many stories like that if you dig  
24 into that community.

13

25 So I want to emphasize the importance of the

1 ongoing community relationships in river-side  
2 communities. And, for instance, in Elysian Valley, as I  
3 look at the various alternatives, from 13 on, it's the  
4 same plan for that particular area and I would say that  
5 in some way, the actual access to the River might not  
6 actually be greater in any of the plans than it has  
7 existed already. So I think it's very important to pay  
8 attention to that.

9           The other thing I want to point out is that in  
10 terms of the analysis, the output analysis, which I  
11 appreciate this kind of analysis, but I want to point out  
12 that historically Elysian Valley connected to the  
13 Elysian Hills and Griffith Park connected to the River.  
14 So both of those areas were historical connections to the  
15 L.A. River.

16           It also should be pointed out that, for  
17 instance, our community historically connected, long  
18 history, to the cornfields and the State Historic Park.

19           So when we look at the output analysis, there's  
20 an analysis on the Army Corps's side that is emphasizing  
21 a scientific analysis of this kind of return and this  
22 kind of output. We also have to consider, though, that  
23 the fact of human habitat being able to turn the corner  
24 into downtown L.A. or those habitat corridors at the  
25 parks to be able to reach down to the River are extremely

13

1 important.

2 I'd make a mixed analogy and say it's sort of  
3 like when you go to the Empire State Building and you're  
4 going up that thing and you stop three floors short.  
5 There is a huge unaccounted-for benefit of, as  
6 everybody's been saying, making these connections and  
7 this is not only on a habitat level. It's on a cultural  
8 level that returns certain routes not only for plants and  
9 animals but also for humans, and there are obviously  
10 economic benefits.

11 We also all have to recognize that there is a  
12 dichotomy between the Army Corps analysis and scope and  
13 the City and the boosterism of elected officials about  
14 this process, but we have to see that this is a human  
15 habitat and an ecological habitat. So I encourage you to  
16 look beyond that output analysis into these things.

17 Thank you very much.

18 MS. SKOPECK: Thank you, sir.

19 Number 16. Please give your card up if you  
20 wouldn't mind as well. Thank you.

21 MR. CORTES: Good evening. My name is David Cortes  
22 and I'm here to support Alternative 20 because not only  
23 will it allow an increase in numbers for Habitat Units  
24 and for the environment and the ecosystems, but it will  
25 also create access and development of green space for the

13

14

1 low-income communities that are adjacent to the L.A.  
2 River, which is an important factor to consider when  
3 being that these communities lack access to green space  
4 as it is, and the incorporation of this Alternative 20  
5 into the revitalization of the River will allow these  
6 families, these low-income communities specifically, to  
7 have access to green space, which will not only enable  
8 them to be more physically active, but it will also  
9 enable them to live healthier lifestyles, promote a  
10 healthier lifestyle here in L.A., which we're always so  
11 consumed with our urban lifestyles; and having this River  
12 revitalized, it will increase people's attention for the  
13 River and care for environment.

14 And on top of that, it will also serve as an  
15 incentive for other areas, other regions in the country,  
16 to follow our lead in this new innovative idea that we're  
17 planning on having in this city of L.A. And that is why  
18 it's time to make the popular investment in  
19 Alternative 20 in order to ensure a brighter and  
20 healthier Los Angeles for everybody here in L.A.

21 Thank you.

22 MS. SKOPECK: Thank you. Are we at number 17?

23 MR. MADRID: Good evening, everyone. My name is  
24 Jorge Madrid. I work for the Environmental Defense Fund,  
25 but I'm delivering comments here as a private citizen, as

14

15



1 a resident of City Council District 1, a bike enthusiast  
2 and an urban planner.

3 I support Alternative 20 for all the reasons  
4 already mentioned of course, the enhancement of green  
5 space and recreation, the expansion of economic activity  
6 and the growth of jobs, the natural services that the  
7 River provides, and I'm also very happy that climate  
8 change was mentioned because that's something that I'm  
9 focusing a lot of my work and research on here in  
10 Los Angeles.

11 Specifically, we know the bad stuff about  
12 climate change, but we also know how we can make  
13 ourselves less vulnerable. We all know how we can  
14 improve adaptation. The Department of Defense and the  
15 Pentagon calls climate change an accelerant of risk and  
16 we know that we can decrease our risk by having a robust  
17 green space, a robust river that can deliver a lot of  
18 services. In addition to flood protection, it also  
19 reduces the urban heat island effect and other effects  
20 that we know are coming with climate change.

21 And, you know, this is exciting. This is L.A.  
22 Let's do this right. Let's not do this on the cheap. I  
23 want to see a better L.A. and I think everybody here does  
24 as well. Thank you.

25 MS. SKOPECK: Thank you. Number 18?

1 MR. GEDEON: 18, yeah. Hi. My name is Geza. Most  
2 people call me Blue. And I represent the Joint River  
3 Oversight Committee, which answers directly to the  
4 Boyle Heights Neighborhood Council and the Downtown L.A.  
5 Neighborhood Council. I'm here to introduce myself.

6 I'm going to come up there in a moment and ask  
7 for your business cards because I would like to contact  
8 you in the future. I've long dreamt of having a meeting  
9 like this where the various stakeholders get a chance to  
10 all chime in at once, but the Army beat me to it. I  
11 think it's a great thing that we're doing this.

12 Just briefly about the various proposals, one  
13 reason I support Proposal 20 is -- no one's mentioned it  
14 before. There's been a lot of great comments about  
15 sensitive issues, but I want to talk about generating  
16 actual cash money and talk about tourism.

17 The Northern Arts District in Downtown L.A. has  
18 turned into pretty much a hub of the media and  
19 entertainment industry. They shoot films there all the  
20 time and it's expanding. They're going to need support  
21 services in the Southern area, which is the  
22 industrialized area of L.A. That's my Alameda East  
23 District so of course I'm interested in it. We're right  
24 by the River.

25 I was on the Boyle Heights Neighborhood Council

1 last year and the Downtown L.A. Neighborhood Council this  
2 year and I realized that there's very few places in the  
3 world that have that many bridges on, you know, both  
4 sides of the bridge -- both sides of the River. So this  
5 is a tourist destination in the making that's ready to  
6 happen and bringing the entertainment industry there and  
7 supporting that and having more opportunities for tourism  
8 and filming in the north end and south parts of the River  
9 will bring families, will bring all sorts of different  
10 things, and it will bring money and bring tourism from  
11 around the world.

12 Thank you very much.

13 MS. SKOPECK: Thank you. Thanks so much.

14 Number 18, please.

15 MR. BROWN: He was 18. I'm 19.

16 MS. SKOPECK: Sorry thank you.

17 MR. BROWN: Good evening. My name is Russell Brown.  
18 I'm a downtown resident. I've been down here for 11  
19 years.

20 We've talked about the tipping point. I think  
21 we've obviously reached a tipping point here, the  
22 awareness of the River. I remember when Lewis was  
23 talking about this 10 years ago, when Ed Reyes and  
24 everybody sort of looked like, Those people are a little  
25 bit crazy; but, you know, if they want that dream, we'll

16

17

1 sort of support it, but it's not really going to happen.

2 I also remember not that long ago, five or eight  
3 years ago, people were saying the same thing about gay  
4 marriage so -- and black presidents, so lots of things  
5 can change.

6 I've been in L.A. for 35 years. You can hear my  
7 southern accent, and Memphis is built on the banks of the  
8 Mississippi River and you would look at the water coming  
9 through all the tributaries and the animals and every  
10 couple of years the river would flood and you look across  
11 Arkansas and that becomes the fertile delta of the river  
12 sort of regenerating the land. It becomes the farmland.  
13 It becomes the ecosystem.

14 New Orleans is sort of my second home and if you  
15 see where the Army Corps of Engineers -- but more  
16 importantly the ecological damage where the everglades  
17 and the marshlands were taken out, and when Katrina hit,  
18 all that water had no place to go.

19 Alternative 20 actually gives us a space that it  
20 has that relief valve. It has all the open space. It  
21 has the maximum amount of space, so when you look at the  
22 economic benefit, when you look at the community  
23 development potential, when you look at the connections  
24 that can be made, really Alternative 20 becomes the best  
25 option. So Alternative 20 in 2020. Thanks.

1 MS. SKOPECK: Thank you.

2 Number 20.

3 MR. BARDEN: Number 20. My name is Lane Barden and  
4 I'm a photographer and artist who has been doing projects  
5 on the River for a long time, I think since 1996, and  
6 when I got here, Lewis had already been talking about the  
7 River for at least ten years, so it's like 25 years.

8 And so what -- I just want to go on record as  
9 saying that we waited a long time and a lot of work has  
10 been done that will never, ever be spoken in this meeting  
11 that will never be told, the story. I don't think the  
12 entire story will ever be told and I feel like  
13 Los Angeles has waited longer for a transformation of its  
14 River than any other city and so I just don't want that  
15 point to be missed.

16 I mean, to some people it may seem like this is  
17 something that just recently happened, but this is the  
18 result of years of struggle and fun and effort and  
19 projects that are unnamed so far.

20 And the second thing I wanted to say is that I  
21 don't think we have a formula for calculating the returns  
22 on this. You know, I mean, when this is done -- I  
23 remember in the '90s we were talking about transforming  
24 the downtown. Everybody was talking about that. Nothing  
25 happened and then SiHart moved downtown and suddenly the

1 entire thing changed and now we have multimillion-dollar  
2 properties. The real estate value has gone up. There's  
3 a community Downtown. If a billion dollars sounds like a  
4 lot, it doesn't sound like a lot to me. It sounds about  
5 the same as a half-billion dollars, you know.

6 If it sounds like a lot now, when this is done,  
7 there's no way to calculate the number of jobs, the -- if  
8 you think the real estate is expensive now, wait until  
9 you do this, and then the taxes and output from this  
10 project will more than pay for it.

11 So I'm asking you -- I'm glad you say you're  
12 tentative about 13, because you should be. You should be  
13 on board for 20, please. I'm asking you.

14 MS. SKOPECK: Thank you, sir. Can we have your card,  
15 please. Thanks so much.

16 Number 21.

17 MR. MURPHY: Hey, how's it going? Good evening,  
18 officials. Good evening, Corps. It's nice to see you.  
19 My name is Edward Murphy. I'm an educator with Heal the  
20 Bay and I'm here to echo some of the same sentiments that  
21 have been said before.

22 Alternative 20 is quite the number. It's a  
23 beautiful plan; but as an educator, I do want to speak in  
24 metaphor. It helps to teach; right?

25 The heart of the River, the heart of

18

19

1 Los Angeles, is the River. It has been since day one and  
2 it's great that so much attention is being given to  
3 taking care of our heart. I will offer the note that  
4 don't forget where all the blood comes from for that  
5 heart.

6 So there is some concern about some of the water  
7 quality elements that maybe should be considered more.  
8 It's great to spend so much time fixing that heart; but  
9 if the blood is still bad, what's going to happen?

10 The second concern I have is where that  
11 reservoir -- maybe where that reservoir isn't being  
12 filled. In Los Angeles, we do have a water crisis. We  
13 import most of our water from other places and there is  
14 of course a great opportunity to reclaim some of that  
15 water, so some considerations for resource reclamation  
16 should be added as well, but that wasn't your charge.  
17 Your charge was habitat and you've done quite nicely.

18 So I know there are a lot of other efforts going  
19 on along the River that will take into consideration  
20 those other things and we should advocate for them as  
21 well, stronger stormwater measures as well as water  
22 resource considerations all throughout, but I applaud  
23 your efforts and I thank you for spending time and taking  
24 care of our heart. Thank you.

25 MS. SKOPECK: Thank you.

1           Number 22.

2           MS. STEFANI: Hi. Good evening. My name is Giulia  
3   Good Stefani and I'm an attorney with the National  
4   Resources Defense Council and I'm speaking on behalf of  
5   the organization, myself, and our 1.4 million members and  
6   activists, 250,000 of whom live here in California.

7           I'm very happy that the Corps and the City have  
8   worked with us and so many others on the same side of the  
9   Los Angeles River ecosystem restoration.

10          Decades ago, the L.A. River was mismanaged by  
11   short-term thinking and an overly zealous past Army Corps  
12   of Engineers. Today, it and the plans that have sprung  
13   up to restore it have become a symbol of hope in this  
14   modern age, hope for America's second-largest city that  
15   suffers daily through all the consequences of past  
16   mistakes and incredible concentration of industry and  
17   activity can make an environmental wrong into a right.  
18   This is a message that will reverberate across the  
19   country and that is deserving of Federal funds.

20          Alternative 13 just won't do. It won't fully  
21   restore the riparian zone or marsh habitat, bring back  
22   ecological processes and increase biological diversity.  
23   Alternative 13 will not adequately increase habitat  
24   connectivity, as many people have talked to that theme  
25   tonight.



1           Only Alternative 20 will connect wildlife from  
2 the Verdugo Hills to the River and finally to the sea.  
3 The Army Corps model fails to adequately consider the  
4 enormous benefit of connecting major tributary and  
5 mountainous areas to the River. The connectivity of the  
6 Verdugo Wash to the mountains is a critical component of  
7 any ecosystem plan and must be included in the Federal  
8 project and only Alternative 20 will fully realize the  
9 River's potential to be a green space, to bring green  
10 space to park-poor, underserved neighborhoods.

11           Only alternative 20 will provide a hydrological  
12 link to the L.A. Historic Park, the cornfields park, the  
13 park that serves downtown and Chinatown area that the  
14 NRDC has a long commitment to supporting.

15           The inclusion of the Verdugo Wash and Piggyback  
16 Yard coupled with the other elements of Alternative 20  
17 provide double the length of channel restoration as  
18 Alternative 13. Increased restoration of a part of an  
19 ecosystem benefits the sustainability of an entire  
20 ecosystem. You don't just gain the benefit of Verdugo  
21 Wash. You benefit all 11 miles.

22           For these reasons -- and I thank you for your  
23 patience -- we stand with our other River advocates and  
24 allies and the City of Los Angeles in our firm support of  
25 Alternative 20. Alternative 20 is a visionary and

1 far-reaching plan that would do the River and the  
2 movement that has sprung up around it full justice.

20

3 Thank you.

4 MS. SKOPECK: Thank you. 23?

5 MS. SOURIAL: Yes, 23. Good evening. My name is  
6 Jill Sourial. I'm here this evening as an individual.

7 I was very happy to see my Congressman,  
8 Congressman Becerra, here earlier supporting  
9 Alternative 20.

10 In my former life for the past eight and a half  
11 years, I was working on staff to former Councilmember Ed  
12 Reyes, as we were working to build consensus and  
13 community support around both the L.A. River  
14 Revitalization Master Plan and the Ecosystem Restoration  
15 Study, and that consensus that you see here today is for  
16 Alternative 20.

21

17 I really think that we've worked not only with  
18 River-adjacent communities but the entire region, with  
19 public agencies. Alternative 20 is the only one that  
20 incorporates the large investments that have been made at  
21 L.A. State Historic Park and so I see this alternative as  
22 already sort of a compromise from where we started.

23 We were originally looking with the Army Corps  
24 at the full length of the River within the city of  
25 Los Angeles and we narrowed it down to the 11 miles so

1 that we could focus that habitat restoration. So I'm  
2 hoping that our representatives in Washington, D.C. can  
3 really understand the significance of the L.A. region,  
4 the number of people it serves, the environmental justice  
5 issues, the value of the habitat in such an urban area.

6 When we first started developing the Master  
7 Plan, we actually toured other cities around the country  
8 that the Army Corps has been working on and we took some  
9 best practices, but we also recognized that Los Angeles  
10 was unique, our southwest River is unique, and we really  
11 hope that our representatives in D.C. can see that as  
12 well.

13 So I'm here to support Alternative 20. Thank  
14 you very much.

15 MS. SKOPECK: Thank you. Sir, number 24?

16 MR. SHEEDY: Thank you. My name is Keenan Sheedy.  
17 I'm a resident of Mount Washington and I work in the L.A.  
18 County health care system. I've biked and walked many  
19 times along the L.A. River where you're able to do it. I  
20 support the Alternative 20 very strongly, and I'm not  
21 going to repeat what other speakers have said, but we're  
22 talking about quality of life here. We're talking about  
23 the impact on people. We have an opportunity to really  
24 bring the whole L.A. region together.

25 As others have mentioned, the River affects

21

22

1 people of all classes and demographic roots across our  
2 county and there is more and more evidence that exercise,  
3 being able to have access to parks, has a direct impact  
4 on our health, a direct impact on our health and the  
5 health of our children.

6 I work in the County health care system and we  
7 see the impact every day of people not being able to  
8 exercise, not being able to exercise safely where they  
9 feel secure, where they want to take their families, and  
10 I'm very concerned with what's going to be happening with  
11 the connection with the cornfields. I take the bus and  
12 the train every day downtown. This is going to have a  
13 critical impact.

14 Alternative 20 is critical for us and a lot of  
15 people are talking about health care costs and  
16 complaining about health care costs. Well, I think it's  
17 time to stop complaining about the costs and looking at  
18 how to keep people well so we don't generate those costs  
19 to begin with. Thank you.

20 MS. SKOPECK: Thank you, sir. Number 25? Skipping  
21 25.

22 MS. JONES: Hi. My name is Susan Jones and I want to  
23 say first thank you very much to the Army Corps of  
24 Engineers. I think you did a great job with the  
25 presentation and thank you for being here.

22

23

1 I'm an L.A. native. I'm here to lend my voice  
2 in support of our L.A. River revitalization. I was  
3 considering moving to Tampa, Florida specifically because  
4 I love being near the water and in Florida they have  
5 water riddled all throughout the city. I was also  
6 considering moving to Chicago specifically because of the  
7 river running through Chicago through the high-rises.

8 I care about the local ecosystem and currently  
9 we have to drive five hours to get to the Colorado River  
10 or three hours to get to the Kern River when we have this  
11 potentially awesome river right here. I'd like to say to  
12 whoever's listening, Please help us turn this dream into  
13 a reality, to allow beauty and nature to run through an  
14 otherwise concrete jungle, and to help us see the full  
15 potential of our city. Thank you.

16 MS. SKOPECK: Thank you. Number 26.

17 MR. BROWNSON: 27.

18 MS. SKOPECK: 27.

19 MR. BROWNSON: My name is Omar Brownson. I'm the  
20 Executive Director of the Los Angeles River  
21 Revitalization Corporation. We were created by the City  
22 of Los Angeles to realize this vision of a revitalized  
23 Los Angeles River.

24 This is a River Restoration Study and  
25 Alternative 13 restores half of what's possible of

23

24

1 Alternative 20 and I think one of the important things  
2 about that is cost. We already own the River and so if  
3 we are to invest in it, we should invest in what we  
4 already own. If we own the River, that's where we should  
5 place our investment. It's already been designated as a  
6 priority by President Obama through the Urban Waters  
7 Federal Partnership. We were only one of seven cities in  
8 the country with that designation to coordinate 13  
9 Federal agencies to work better together.

10 We were only one of two places in California  
11 selected for the President's America's Great Outdoors  
12 Initiative. That's his 21st Century recreation and  
13 conservation agenda.

14 We were only one of 11 cities selected by the  
15 EPA for its green infrastructure program. The Federal  
16 government clearly cares and so it should show that  
17 caring with Alternative 20.

18 I want to just read some names really quickly.  
19 This comes from a letter that was written almost two  
20 years ago to the day to Assistant Secretary of the Army  
21 of Civil Works, Jo-Ellen Darcy, October 14th, 2011.

22 It was signed because the River Study was on the  
23 ropes. It didn't have Federal funding through Congress  
24 and so nine organizations came together -- Tim Brick with  
25 the Arroyo Seco Foundation; Nancy Steele with the Council

1 for Watershed Health; Lewis MacAdams from Friends of the  
2 Los Angeles River; Bruce Saito, L.A. Conservation Corps;  
3 The River Corporation; Melanie Winter from The River  
4 Project; Carolyn Ramsay, then Director for the Trust for  
5 Public Land; Andy Lipkis from Tree People; Meredith  
6 Mckenzie from the Urban Rivers Institute -- because even  
7 then two years ago when we were on the ropes, we came  
8 together. And when we came together, we got funding in  
9 the President's project for the first time ever. This is  
10 a national priority. Let's make it so. Thank you.

24

11 MS. SKOPECK: Thank you. Sir, what number are you?

12 MR. HANS: 28.

13 MS. SKOPECK: Okay. Thank you.

14 MR. HANS: Hello. I'm Gerry Hans. I'm president of  
15 Friends of Griffith Park, a nonprofit.

16 We have a formal letter forthcoming with  
17 detailed justifications, but we are in strong support of  
18 Alternative 20 which will enhance connectivity and  
19 further promote diodiversity (phonetic) and diodiversity  
20 of the area.

25

21 Let me remind everyone that a good portion of  
22 the River is actually within the borders of  
23 Griffith Park. Friends of Griffith Park is reaching out  
24 to our scientific community, in particular those that  
25 have participated in over six years of work in

1 Griffith Park completing about nine different biological  
2 surveys. Those are known collectively as Griffith Park  
3 Natural History Surveys. They range from large mammals,  
4 bat surveys, birds, herps, and even michological. The  
5 scientists that I've spoken with all have the same  
6 opinion: Better connectivity between the Santa Monica  
7 Mountains and the Verdugos and the Angeles National is  
8 extremely beneficial. The big stepping stone is of  
9 course of the Verdugo Wash opportunity.

25

10 Biologically speaking, let's remember that  
11 urbanization is an extremely recent phenomenon. The  
12 detrimental effects of lack of genetic variabilities for  
13 wildlife and plants is something that may not be felt for  
14 decades or centuries; but right now in the present day,  
15 we can help guard against that problem.

16 Now is the only time for Alternative 20.

17 MS. SKOPECK: Great. Thank you.

18 It's getting kind of loud again in the back. If  
19 those of you who can hear me in the back, if you could  
20 please be a little bit quieter, thanks.

21 Ma'am, number 29.

22 MS. WEST: Hi. My name is Carolyn West and I'm  
23 speaking on behalf of the Bette Davis Park Rancho Avenue  
24 Section Neighborhood Watch Group and we're also part of  
25 the Glendale Rancho Neighborhood Association.

26



1 I want to support Alternative 20 very much and  
2 I'm a lifelong naturalist, a 42-year member of Sierra  
3 Club, amateur entomologist. You name it. I'm out there  
4 watching the birds every day.

5 I am concerned about no adequate explanation of  
6 what Reach 2 widening of the L.A. River is. I live a  
7 short distance separated by a narrow stretch of horse  
8 trail and Bette Davis Park from the River, right at the  
9 confluence with the Burbank western channel.

10 The land flooded before it was channelized. The  
11 section of the park there is silt. It's all silt that  
12 was deposited by this River flooding and I don't really  
13 understand how this is going to work. I just want to  
14 make sure we have -- okay. We have some people on the  
15 Neighborhood -- a couple people carry flood insurance  
16 now. The area is designated as a dam inundation area.

17 I also want to point out that we've been posted  
18 as a West Nile virus area now. In fact, new signs were  
19 just put up about a week ago when the vector control was  
20 out.

21 Our street doesn't have any storm drains. It's  
22 designed for the water to run easterly on Rancho and then  
23 somehow make its way into Bette Davis Park and there it  
24 stays. There's no way for it to travel from Bette Davis  
25 Park into the River. There is a basin that can catch

1 water, but it cannot be drained when the River is  
2 flooding.

3           So these are my basic concerns, and I'd like to  
4 support the 20. It sounds -- everything about it sounds  
5 really good, but I don't understand just what's going to  
6 happen in my own backyard and I have seen since I've  
7 lived there in years of heavy rain how the water pounds  
8 down that channel and waves are leaping virtually at the  
9 top of the concrete and, I mean, this is really dramatic.  
10 You know, if you don't live next to the River, if you're  
11 not standing there right at the peak of flooding and --  
12 you know, the safety and flooding is something that I'd  
13 like to have addressed. Thank you.

14           MS. SKOPECK: Thank you very much.

15           Are you number 30?

16           MS. OINUMA: Yes. Hello. My name is Colleen Oinuma.  
17 I'm here on behalf of Congressman Adam Schiff and I'm  
18 going to read a short statement from him. I had to pare  
19 it down to fit into the three minutes.

20           I join my fellow nature lovers and River  
21 advocates in voicing my support for Alternative 20, a  
22 comprehensive restoration of the L.A. River. This option  
23 is the most aggressive restoration plan, as it includes  
24 all elements of Alternatives 10, 13, and 16 and also  
25 includes naturalization and ecological restoration in all

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27

1 reaches of the River and inclusion of two major  
2 confluences.

3           Specifically, Alternative 20 includes the  
4 restoration and beautification of the Verdugo Wash  
5 bordering the city of Glendale and the connection of the  
6 L.A. River to the Los Angeles State Historic Park. The  
7 residents of my Congressional District, which includes  
8 the cities of Burbank, Glendale, and many Los Angeles  
9 city neighborhoods adjacent to the River, will have  
10 greater access to the River for recreation and an  
11 improved quality of life.

12           I recently had the pleasure of taking my son on  
13 a kayaking adventure down the Los Angeles River and  
14 witnessed a true revival of this wonderful habitat. We  
15 saw abundant plant life, navigated rapids, almost fell  
16 over several times, and marveled at the resiliency of the  
17 nature around us. I've gone running and biking along the  
18 River, attended community events and cleanups along its  
19 banks, and have seen firsthand how a River that once  
20 divided communities is now bringing them back together.

21           It's my hope that the Army Corps of Engineers  
22 will continue to work with the City and nature lovers to  
23 embrace the public/private partnership and complete  
24 restoration of the L.A. River so that the ecosystem  
25 remains strong for future generations.

1           Thanks.

2           MS. SKOPECK: Thank you.

3           31.

4           MR. LOMBARDI: 31. Good evening. My name  
5 Sergio Lombardi and I'd like to say that Alternative 13  
6 is fine, but this is not fine L.A. This is Greater L.A.  
7 We need to have Alternative 20 because it is just that.  
8 It is greater.

9           This alternative will be able to produce a lot  
10 of economic opportunities for us. This is the time that  
11 we need to go ahead and do the right thing, the hard  
12 thing. We don't do things that are easy. We do things  
13 that are hard. Since when have we shied away from doing  
14 something that is hard and right?

15           We need to go ahead and approve Alternative 20  
16 because it is the right thing to do. Thank you.

17           MS. SKOPECK: Thank you.

18           Sir, 32?

19           MR. KHAN: Yeah. Hello. Mohammed Khan. My  
20 organization is SOPP, Society to Offer Prosperity and  
21 Peace.

22           I support Alternative 20 for three reasons.  
23 First of all, I grew up around the Sacramento River, so  
24 I'd like to have other children, other families, to enjoy  
25 a River.

28

29

1 I'll give you an analogy. When you do surgery,  
2 you don't do a piecemeal surgery. We're talking about  
3 environmental surgery, so this amount of money for  
4 Alternative 20 to me is a crumb. We definitely need to  
5 do it and do it right.

6 The three reasons is: Number one, balance  
7 between urban life and river life. We want to bring  
8 river life to communities that may be underserved and  
9 that's going to affect the sociology of those communities  
10 which has short-term and long-term effects. Reason two  
11 is water resources is very precious and very crucial and  
12 any strategy to preserve it is worth its weight in gold.  
13 Number three is -- and I don't know about your report, if  
14 you covered it -- is the revenue side. There are revenue  
15 models around ecotourism, et cetera, et cetera.

16 As far as -- you know, I thank the Army Corps of  
17 Engineers. They're very dedicated professionals that  
18 want to serve the society and community in the best way  
19 they can. I want to thank Senator Boxer, Congressman  
20 Becerra, but I want to tell the Mayor when you go to  
21 Washington and they talk about money, tell them stop war  
22 one day and we will take care of this.

23 MS. SKOPECK: Thank you.

24 Ma'am, what number are you?

25 MS. VARGAS: 33.

1 MS. SKOPECK: Okay.

2 MS. VARGAS: Hello. I'm Brenda Vargas. I'm a Field  
3 Deputy for Congressman Xavier Becerra and I'm here to  
4 read a statement on his behalf.

5 We've reached the fork in the history of the  
6 Los Angeles River. The U.S. Army Corps of Engineers,  
7 working with the City of Los Angeles, has released an  
8 extensive and long-awaited study that can help chart a  
9 new course for the River's ecosystem and its  
10 surroundings. Angelenos now have the chance to weigh in  
11 on the River's future as they review the different  
12 restoration alternatives.

13 I support the Study's Alternative 20 Restoration  
14 Plan that is an inclusive ecosystem restoration,  
15 increases green space, and truly reconnects people and  
16 the River. Let's grasp this opportunity to reimagine a  
17 once blighted and neglected waterway into a foundation  
18 for a more sustainable and liveable communities.

19 Thank you.

20 MS. SKOPECK: Thank you.

21 34, sir?

22 MR. SCOTT: 35.

23 MS. SKOPECK: 35.

24 MR. DE ROSA: My name is Charles DeRosa. I'm  
25 representing the Los Angeles Kayaking Club, and it seems

30

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1 to me L.A.'s been given a wonderful opportunity in all of  
2 this that has taken a long time to come around and I  
3 can't speak to the complicated matrix and calculus that  
4 the Corps has to go through because I'm not a scientist  
5 and I haven't read the 500-page document, but I did --  
6 Dr. Axt, I did understand your analogy, the metaphor  
7 about why 13 was chosen. I'm going to sound like a  
8 politician here when I say that I don't understand the  
9 calculus of it, but at some point somebody has to make  
10 sort of a decision that it can't simply be mathematics.

11 And I was thinking about President Kennedy and  
12 thinking, well, you know, we can orbit the earth and get  
13 to here, you know, but it's going to cost a lot more for  
14 us to land on the moon. And so I encourage you in this,  
15 you know, 10, 30, 40 years of work here that we need to  
16 go all the way on Alternative 20.

17 MS. SKOPECK: Thank you.

18 36?

19 MS. TACHIKI-CHIN: I'm 37.

20 MS. SKOPECK: 37. Okay. Go ahead.

21 MS. TACHIKI-CHIN: Good evening. My name is Kim  
22 Tachiki-Chin. I'm speaking on behalf of Congresswoman  
23 Lucille Roybal-Allard and I know during the press  
24 conference I said I wasn't going to speak, but I just  
25 wanted to thank the Corps for holding this public session

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1 hearing for the community and to thank all of our River  
2 sisters and brothers for making their -- Dr. Keel  
3 Armstrong -- riverly supportive comments for  
4 Alternative 20 and just to remind everybody that the  
5 Congresswoman is in support of Alternative 20 and I have  
6 her statement that I will submit with my card.

32

7 And I want to yield myself a few seconds on  
8 behalf of Pauline Louie from the Urban Waters Partnership  
9 who said that Alternative 20 is the only one that really  
10 achieves a level of connection between communities,  
11 habitats and recreation areas and revitalization  
12 opportunity sites.

33

13 So that's on behalf of Pauline and I have her  
14 card here as well.

15 MS. SKOPECK: Okay. 38?

16 MS. MAULANO: Yes. Hi. I'm Lucia Maulano. I'm a  
17 stakeholder and business owner in CD 13, specifically in  
18 Silver Lake, and I want to say that I am in full support  
19 of 20, but my comment really is more to bring a greater  
20 vision to the L.A. River; and that is, I respect the work  
21 of the Army Corps of Engineers. I mean, it's incredible  
22 work, but I just want to talk about what people are  
23 referring to, sustainability and resilience.

34

24 Sustainability doesn't refer to linear,  
25 mechanistic visions. It refers to a holistic. So while



1 I do support Alternative 20, I support even a greater  
2 vision of revitalizing the entire River. Imagine that.  
3 Even ten years ago we didn't even think of 11 miles, but  
4 the reason why I say that is because the floodplain  
5 threat was created because of density issues, the way we  
6 developed around the River.

7 People do historically go to the River. They go  
8 to it to sustain themselves, but the way the human  
9 species did it was to completely command it and overrun  
10 it so that we couldn't share in all of its beauty.

11 So while I do fully support Alternative 20, I  
12 support a greater sustainable vision, a holistic vision,  
13 because sustainability, ladies and gentlemen, is a  
14 three-legged stool. It's social, economic, and  
15 environmental justice. You can't have a one-legged stool  
16 and sit sustainably. You need all three dimensions.

17 So my public comment is Thank you, Army Corps of  
18 Engineers, for your work, but I'd like to push it  
19 further. I'd like to really push for a sustainable  
20 holistic vision. Thank you.

21 MS. SKOPECK: Great. Thank you.

22 39?

23 MS. HEDGE: My name is Joanne Hedge and I'm here as a  
24 17-year resident of the Glendale Rancho equestrian  
25 neighborhood where I'm president of the Glendale Rancho

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35

1 Neighborhood Association.

2 We live immediately adjacent to Bette Davis Park  
3 and very close to -- I'm a block and a half from the L.A.  
4 River and very close to the Verdugo Wash, but I am most  
5 proud to be associated with a dream that took more than  
6 ten years and working with a terrific Parks Unit at the  
7 City of Glendale on a project, in fact, that was managed  
8 by this gentleman right here, John Pearson, the  
9 ever-tireless project manager, and we rallied residents  
10 to help create what is now an area that was blighted and  
11 is now beautiful, and it is first phase of the Glendale  
12 Narrows River Walk Park, which is for the public and has  
13 a couple of horse facilities and pedestrian and cyclists  
14 amenities and all native plantings and so on.

15 It's only been only open not even a year and the  
16 second and third phases are on-line and by the time it's  
17 finished, Glendale will be the first city, I believe, on  
18 the entire Los Angeles River to be able to say that its  
19 borders with that river are all completely park land.

20 So this project resonates very deeply with me  
21 and at the age of 70, I know I'll be around to see it  
22 when it's finally realized. I don't know how far I'll be  
23 able to cycle or walk, but I'm planning on it. But I do  
24 support personally, and I know on behalf of many  
25 residents in Glendale Rancho as well, the Alternative 20.

1 I think it's the only way to go on something like this in  
2 a city of this sort.

3 I believe it represents a new age of  
4 enlightenment in Los Angeles which isn't just simply  
5 cultural but also is in tune with the habitat and  
6 environmental and social needs here. And as they say,  
7 there will be some bumps in the road. I'm sure there  
8 will be community outreach regarding concerns some of us  
9 might have who live so close to the River and Bette Davis  
10 Park and whatnot, but I am in complete support of it and  
11 also as a member of Sierra Club and a huge longtime  
12 supporter of Friends of the L.A. River, Lewis MacAdams --  
13 bless his heart for starting all this -- and thank you to  
14 the Army Corps for giving us this.

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15 MS. SKOPECK: Thanks.

16 Sir, are you 41?

17 MR. REYES: 40.

18 MS. SKOPECK: 40.

19 MR. REYES: First of all, I want to say thank you so  
20 much. I'm former Councilman Ed Reyes and I wanted to  
21 first say thank you to the Colonel and to the staff.

22 Josephine, you've been tremendous.

23 The whole team has been amazing. Carol  
24 Armstrong, Deborah Weintraub, the City family, we've all  
25 gathered here.

36

1           Gosh, that was almost 12 years ago when we first  
2 started going to Washington, D.C. and I'm going to say,  
3 Colonel, it was four colonels ago. I think it's every  
4 three years where there's a change of guard.

5           But also meeting all these different generals  
6 and going to MOB, going to the Congressmembers and going  
7 to the senators year after year, having L.A. River Day in  
8 Washington, D.C. where Congressman Becerra and Allard  
9 would be the host and invite all the other  
10 Congressmembers from throughout the Southern California  
11 region to speak to the aquifer, to speak to the regional  
12 issue on how the River's but one step of a greater issue,  
13 which is how will we protect our water base, how we will  
14 recycle it, how we will rejuvenate that which is  
15 essentially neglected for so many years.

16          Today we have an opportunity to break out of our  
17 silo to look at HUD, to look at the Department of  
18 Interior, to look at all the other departments within the  
19 Federal branch. As a former executive of the National  
20 League of Cities to Resolutions, we've been asking the  
21 Federal government to look at the inner cities,  
22 especially Los Angeles, the second-largest city in the  
23 country, with the largest number of ethnicities that  
24 represents the world economy to provide us the type of  
25 coordination where HUD, Department of Interior,

1 Department of Transportation, all the departments can be  
2 part of the Army Corps, where the Army Corps doesn't have  
3 to feel that it's carrying this alone. You're not alone.  
4 We've been making sure that it won't be and that  
5 discussion evolves in that direction.

6 So we do see the numbers as they've been  
7 represented and why they're not choosing Alternative 20.  
8 I wonder are we doing our best to understand the natural  
9 strengths of what our tax dollars can do? What's  
10 happening to this city today should be happening  
11 especially in this part of town along this beautiful  
12 River. We have that opportunity to create that change  
13 and we spent ten years trying to do that for all of us.

14 I dedicated as Chief of Planning and Land Use  
15 Committee for the City of L.A. the time because I grew up  
16 next to the River, my parents still live a block and a  
17 half away. We have 49 percent dropout rates in our high  
18 schools right now. 40 percent of the communities in this  
19 area are at or below poverty. We've got Chinatown around  
20 the bend. You've got Koreatown just a mile away. You've  
21 got a whole range of ethnic groups together with the  
22 folks who live on the hillsides, who live on the  
23 flatlands, the Italians, the Jewish communities of  
24 decades past who are still here who are fighting for all  
25 the same in terms of wanting to see this change.

1           So when the question is asked, Where will our  
2 water come from, we can store it in this amazing  
3 corridor. We can recycle it. We can create economic  
4 development strategies so we can enhance natural  
5 habitats. But more importantly, we can create jobs that  
6 this great city needs and it's all in your hands. You  
7 have that ability and I know the regional directors of  
8 this region have been supportive.

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9           The question is, Can you show us how to get to  
10 the next level within this structure to advocate and  
11 allow us to fight for what we think is best for this  
12 great country?

13           So, again, thank you so much for your time.  
14 Thank you for all of your hard work. It's endless nights  
15 and long weekends making reports happen and making sure  
16 that we got to a place that we deserve. Thank you.

17           MS. SKOPECK: Thank you, sir.

18           41? 42?

19           MR. MAC ADAMS: Hi. My name is Lewis MacAdams. I'm  
20 the president of Friends of the Los Angeles River and I  
21 think that there's an unsung hero tonight. Well, there's  
22 several, including Merrill Butler, whose grandfather  
23 designed and built most of the great Downtown L.A.  
24 bridges, but I'd also like to note that a lot of us are  
25 here because Karen Flores and Friends of the Los Angeles

37

1 River's audience reached out and basically built this  
2 audience one by one tonight. She's the real unsung hero.

3 And there's nothing I can add really to what was  
4 said before except that we know that there's a strong  
5 support for Alternative 20 within the L.A. District of  
6 the Corps of Engineers, but really we are talking to --  
7 tonight everything that everybody has said is being said  
8 to the National Headquarters of the Corps in Washington  
9 and I'd like to sort of put that into the reality that  
10 we're trying to leap across time and space to touch the  
11 hearts of the Corps of Washington, and I know a lot of  
12 people have already left and there's a lot of empty  
13 chairs, but I would like just everybody to just make a  
14 little noise of 30 seconds of applause and hooting and  
15 how much we want this Alternative 20 and how much we're  
16 willing to say.

17 So let's put your hands together, yell and  
18 scream and scream and stand and scream and put your hands  
19 together to say Hello, Washington, here we come.

20 MS. SKOPECK: Thank you.

21 42?

22 MS. NUNEZ: 42. My name is Irma Beserra Nunez. I'm  
23 an instructor with Los Angeles Unified School District,  
24 Division of Adult and Career Education Programs for Older  
25 Adults. I have over 200 active older adult students who

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1 are the mentors and caregivers for their grandchildren,  
2 who care for the elderly, and who make it possible for  
3 their adult children to work and go to school and develop  
4 new careers. One of my students is here today.

5 And my ancestors have lived in California for  
6 over 300 years. I live currently in the San Fernando  
7 Valley in Encino, right next to the Sepulveda Basin  
8 Recreation Center where there are numerous lakes, archery  
9 fields, soccer fields, where there are walking trails;  
10 and when it rains, it has everything set up where the  
11 streets are closed off and then when it's done, we have  
12 this beautiful area.

13 My family has lived in Boyle Heights East L.A.  
14 for over a hundred years and sadly we saw how the  
15 freeways cut through our beautiful parks and the River,  
16 and the freeways cut through our beautiful communities,  
17 and so we are strong, passionate supporters of  
18 Alternative 20, because Alternative 20 is the only option  
19 that is really going to create equitable accessibility to  
20 the environment, to recreational resources for all  
21 communities in the city of Los Angeles.

22 My students and I have been very fortunate and  
23 privileged to have worked for the past seven years with  
24 our Mayor, Eric Garcetti, Councilmembers Ed Reyes,  
25 Gil Cedillo, Jose Huizar, with Xavier Becerra, and we



1 know that this plan is really the best plan for all  
2 communities, for all cities.

3 And also, I currently teach in Glassell Park,  
4 Highland Park, Eagle Rock, and the San Fernando Valley,  
5 so not only active senior citizens need to have access to  
6 these facilities, but every generation and their family  
7 needs to have these facilities.

8 This is a once-in-a-lifetime opportunity. This  
9 is not going to happen again. We cannot play with our  
10 river piecemeal. It is critical that we go all the way  
11 and, as others have said, including our Mayor Eric  
12 Garcetti, this is really not all the way. Alternative 20  
13 is the best option that is presented to us today, but  
14 that we know that there is more that can be done and so  
15 the people of the city of Los Angeles has proven that we  
16 will step up to the plate. We will raise the taxpayer  
17 dollars that are needed to complement the work of the  
18 Federal government and the Army Corps of Engineers.

19 And so we thank you so much for this opportunity  
20 and we strongly support Alternative 20 as the only plan.

21 Thank you.

22 MS. SKOPECK: Thank you, ma'am. I appreciate it.

23 Number 43?

24 MR. LESTER: Yes. Hi. My name is Ely Lester. I'm a  
25 resident of Glendale. I live there with my wife and

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1 infant son.

2 I just wanted to thank you for surprising me  
3 with the scope and ambition of what these studies came up  
4 with. I just can't think of anything else that will make  
5 a larger impact on this region over time than starting  
6 with the geographical feature that caused the location of  
7 Los Angeles here and, you know, Alternative 20 affects  
8 Glendale where I live and it affects Burbank where I  
9 work. It's the only one that makes significant effects  
10 to those places.

11 The other thing I'd like to say is just for  
12 younger people who decide to live in L.A., there's always  
13 been a -- at least from my perception, a sense of the  
14 potential, unrealized potential, and so you're sort of  
15 thinking about a potential that could come true and  
16 that's sort of what you live for and hope for in the  
17 future. I think this plan is the best thing I've heard  
18 of to help make that happen.

19 MS. SKOPECK: Thank you.

20 Number 44?

21 MR. MOREAU: Hi. My name is Jack Moreau. I'm here  
22 as a resident of Highland Park. I've been living here  
23 for about four or five years. I graduated from  
24 Occidental recently.

25 I, too, am in support of Alternative 20.

39

40

1           There's one thing, though, aside from all the  
2   great comments I heard tonight, that I would like to make  
3   in addition to what I heard, and it's the topic of gender  
4   equity when looking at parks. So through my research, I  
5   came across the book that Planning Los Angeles released a  
6   couple years ago, edited by David C. Sloan, and there's a  
7   great chapter in it. Now, I forget the exact author of  
8   that chapter, but she noted how girls are  
9   underrepresented in parks versus the number of boys and I  
10   would like to see this change as we move forward.

40

11           Now, I think in planning L.A. River, we're  
12   clearly very well represented by women. I'm proud to see  
13   such an awesome source of knowledge for the L.A. River.

14           And so I think the L.A. River offers that  
15   opportunity because it's a unique park. It's completely  
16   different than anything the city has seen and so I think  
17   with that in mind plus the possibility of different  
18   programming in conjunction to the River, we can actually  
19   see some of the statistics change to equally represent  
20   all populations. Thank you.

21           MS. SKOPECK: Okay. Thank you.

22           45? 46? Sir, what number are you?

23           MR. DRENNAN: I'm 49.

24           MS. SKOPECK: Let's do it.

25           MR. DRENNAN: Hi. My name is Michael Drennan. I'm

1 the Watershed Management Practice Leader for an  
2 engineering company Black and Veatch, but I'm here as the  
3 vice president for the Council for Watershed Health which  
4 was started about 20- -- well, in 1996, and I moved here  
5 about 20 years ago and met Dorothy Green and fell in love  
6 with the River and this opportunity that we have here is  
7 a culmination of, as many people have said, a lot of  
8 people that aren't even here anymore, but I do feel  
9 Dorothy smiling down on us, looking at a parking lot  
10 that's overflowing at a center that was going to be torn  
11 down and is now the L.A. River Center.

12 So we proved that there's progress that we can  
13 make and I want to acknowledge the Corps of Engineers for  
14 the incredible Alternatives Analysis and the information  
15 that you guys have put together and your leadership.

16 I want to acknowledge the City of Los Angeles  
17 for their leadership and Carol for just your passion and  
18 acknowledge Ed Reyes, and there's just so many people  
19 that have come to this moment and I've been trying to  
20 think here, you know, it's like we all support  
21 Alternative 20. It's like, Well, so what?

22 What is it that we have to do to compel our  
23 leadership within the Federal government to make that  
24 choice? And I think frankly none of us really know, but  
25 one thought that does occur to me is we're sitting in the

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1 most populous county in the U.S. of A. So there's got to  
2 be some residents that says this project in the same way  
3 that the Florida Everglades is recognized as an important  
4 project for the United States of America, this project is  
5 important not just for Los Angeles. It's important as a  
6 symbol, as an opportunity to demonstrate what's possible  
7 in an urban area where we're trying to create a healthy,  
8 restored ecosystem. And I thought it was fascinating  
9 that we're willing to talk about trying to get one  
10 mountain lion hooked up, you know, and we've got  
11 11 million people in this county that all they want to do  
12 is touch the water.

41

13           You know, I have a couple of young kids and I  
14 talked to them about If you were from another planet and  
15 you came here and wanted to show somebody something that  
16 they had never seen, if they had never seen water before,  
17 you can stick your finger through it, you can look  
18 through it, you can pour it. It's like liquid diamonds.  
19 It's something to be revered.

20           We pay a million dollars an acre-foot to drink  
21 it out of a bottle that comes from, you know, France and  
22 we're willing to tax ourselves to actually take care of  
23 the water that we have here locally, and we appreciate  
24 anything that we can do to compel our leadership in  
25 Congress, in the Federal government to support

1 Alternative 20. So thank you.

2 MS. SKOPECK: Thank you.

3 Ma'am, did we skip you? Sorry. Are you -- what  
4 number, please?

5 MS. BLEITZ-SANBURG: I'm 46.

6 MS. SKOPECK: Sorry.

7 MS. BLEITZ-SANBURG: Well, I wish I was.

8 My name is Dana Bleitz-Sanburg and I wear many  
9 hats. I'm an archeologist, a beekeeper, I work up at the  
10 Stough Canyon Nature Center in Burbank, and I'm also a  
11 member of Southwestern Herpetologist Society, which is  
12 study of reptiles and amphibians.

13 So I'm here to just support, intensely support,  
14 Plan or Alternative 20 since we didn't get 21.

15 And as I work with families, people come up to  
16 our nature center. They've never seen a lizard in the  
17 wild and that's just so tragic. I was lucky. I grew up  
18 in the San Fernando Valley. My dad was born in  
19 Hollywood. My grandfather came from Illinois to  
20 Hollywood. He had his bees along the River. My dad  
21 fished out of the River. My parents took us bicycling  
22 along Bette Davis Park before it was Bette Davis Park and  
23 fishing and playing with the frogs, spotting turtles in  
24 the water. It was wonderful. I saw it as a  
25 concrete-lined river, but when it didn't flood, we got to

1 see habitat grow.

2 As one of my research areas as an archeologist  
3 of paleoclimate, the Alternative 20 allows for natural  
4 cyclic wet and dry events from El Nino/La Nina that the  
5 others don't allow for and still have something left  
6 after you might have a little bit of rise in water. You  
7 need wider channels, maybe a few zigzags to slow the  
8 River down a little bit, but it's a comprehensive plan  
9 that really allows the River to thrive and produce; and  
10 the habitats and the wildlife that it's capable of.

11 And for people who are worried about the insect  
12 problem, when you have healthy insect populations, you  
13 have your dragonflies who are eating mosquitoes. The  
14 insects support your reptiles and amphibians. The frogs  
15 eat the mosquitoes and so do the tadpoles. You also then  
16 have your healthy birds and bats which are eating your  
17 insects and mosquitoes. So I think a healthy  
18 Alternative 20, you don't have that issue of stillwater  
19 in the negative way. Thank you very much.

20 MS. SKOPECK: Thank you.

21 Who's next? Do we have anyone else who wants to  
22 speak?

23 MR. O'BRIEN: Yes. I'm making quite a jump in  
24 numbers. It's 56.

25 MS. SKOPECK: Anyone before 56? Okay.

1           And what number are you, just so I can try to  
2   keep --

3           MR. SCOTT:   51.

4           MS. SKOPECK:   Okay.

5           MS. HUERTA:   Good evening, everyone.   My name is  
6   Denita Huerta and thank you so, so very much for putting  
7   this project for all of us to take part in.

8           I think what is so special for me about this is  
9   I became a part of the green world when I couldn't  
10   pronounce the verbiage on green and we had to come into  
11   cost, building the first apartment building in  
12   Santa Monica at 501 Colorado, having to do something that  
13   was a little difficult, but as in today again, we all got  
14   to eat.   We need jobs.   We need this government not to  
15   hear us but to write a check and we need it.

16           We need this project to start, because you've  
17   spent so much time and research outlining this.   It's  
18   perfect.   Every single one of these areas' categories are  
19   perfect, but the one we need is 20.   We need that today,  
20   just like they shut us down.

21           We're not taking it anymore.   All area codes  
22   need to eat.   You're the Army, we've got the Federal  
23   government, we've got the police force, and we've got  
24   Congress and the Senate.   Who writes the check?

25           All of -- anything else I can say would be our



1 climate. What is going to happen to our climate? Did  
2 you see the pictures from NASA? We're all Twitter and  
3 Facebook. Do you see what's going on, 'cause somebody  
4 isn't explaining it to them.

5 I'm a mom. I think all of us are mothers,  
6 fathers, grandfathers, people of the community who want  
7 to see this end.

8 I've represented Eric Garcetti from the  
9 Palisades to Watts, to Glendale to many people I haven't  
10 seen for a long time here tonight. However, we've got to  
11 stand together to get this done, let's do this.

12 20 is what we need. How do we get there?

13 Denita Huerta is here. Thank you.

14 MS. SKOPECK: Thank you. 53?

15 MR. O'BRIEN: I'm 56.

16 MS. SKOPECK: Okay.

17 MR. O'BRIEN: Yeah. Thank you. My name is  
18 Frank O'Brien. I'm here representing an organization,  
19 the Watts Watershed Association, from the southern part  
20 of the River and I was glad Drennan mentioned  
21 Dorothy Green. She's certainly one of the prime sources  
22 for the River. As I was driving here, I thought I heard  
23 Huell Howser's voice telling me what I should be saying.  
24 I won't try to imitate his accent, however.

25 My comments focus on the Alternatives Analysis

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1 and I have a couple of points. The first is the analysis  
2 really needs to consider the watershed as an  
3 interconnected total system. In the document, the  
4 Compton Creek isn't even indicated as a tributary of the  
5 L.A. River, if you look at Figure 3.1 and the narrative  
6 at page 61.

7 Also, the Historical Dominguez riparian area,  
8 the maps are not correct and that's because the document  
9 relied on secondary sources rather than going to the  
10 primary sources, so I urge you guys to look at that.

11 Why is that important? Well, what happens  
12 upriver affects what happens downriver and in your  
13 Analysis of Alternatives, you should include not just the  
14 footprint benefits at the sites but the total system  
15 benefits.

16 So, for example, measures upstream can affect  
17 positively the natural resources in the tidal prism and  
18 in the San Pedro Bay, for example, directly and also  
19 indirectly in places like Watts where there is a section  
20 of the Compton Creek. The creek is a main part of  
21 revitalization efforts that the City of L.A. is trying to  
22 do. Compton Creek also has a natural section, as we  
23 know.

24 So in calculating the total benefits, don't just  
25 look at the footprint. Look at the totality.

1           Also, I note on your distribution of your  
2 document, the down-range Congresspeople are not included,  
3 whether it's Congressman Lowenthal, Congressman Hahn, who  
4 in the past have strongly supported the River.

5           In terms -- I'm going to focus and just say a  
6 few words about your CE-ICA, which is your cost-benefit  
7 formula. The alternatives are not policy neutral. In  
8 other words, you want to make sure that we capture all  
9 the benefits. And as was indicated earlier with the  
10 notion of the wildlife corridor, the incremental marginal  
11 focus sometimes misses additional benefits that spending  
12 up to X doesn't achieve.

13           And as an example for that, I'll use the  
14 Greenline Metro which did not go to LAX. The incremental  
15 miles because they were probably so expensive defeated  
16 the notion of getting people to use public transportation  
17 to get to the airport, so a total benefit was lost under  
18 calculations that just looked at the incremental.

19           Some people say that 20 -- I think I have a  
20 little more time, actually, as an organization, very  
21 quickly.

22           Some people that say 20 that is too ambitious.  
23 I actually think that it's too modest. I was looking for  
24 a plan to restore Chavez Ravine to its original  
25 condition. I didn't see that, unfortunately.

1           What I did do as a rough back-of-the-envelope  
2   calculation using your Table 4.10 and I didn't change any  
3   of the costs. I just made a rough assessment of your  
4   benefits, and it changed your net average AHO from 20 --  
5   for 20 from 6,782 to 8,225 and it changed the Incremental  
6   Unit Cost for 20 to less than 13. So it was 7,750 versus  
7   7,900. So by capturing these benefits, you can actually  
8   change the real numbers that you're forced to make the  
9   decision on so consequently the preferred choice is not  
10   the Locally Preferred Alternative, but it's the --  
11   there's a term that you guys used for it here. Forgive  
12   me. It's the -- it's the -- yeah, the NER. Yes.

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13           Thank you very much. It's the NER plan.

14           MS. SKOPECK: Sir, do you want to wait until  
15   everybody else has had a chance so it's fair?

16           MR. O'BRIEN: I'm happy to give up the microphone. I  
17   think I've made my comments. Thank you very much.

18           MS. SKOPECK: Oh, you're an organization. I'm sorry.

19           If you're representing an organization, it's  
20   double the time. So I want everybody else to know what's  
21   happening.

22           MR. O'BRIEN: May I make three brief comments?

23           MS. SKOPECK: Sure.

24           MR. O'BRIEN: These are my summary of  
25   recommendations. I really appreciate the audience

1 hanging in for such a long period of time.

2 Use the original sources, not the secondary  
3 sources, for the information.

4 Do a comprehensive analysis to include the total  
5 watershed benefits within the net average AHO and to the  
6 degree permissible -- we don't want to change the rules;  
7 we don't want special rules, right? We just want to use  
8 them expansively -- within the CE-ICA model, include all  
9 the benefits, including the public policy and aesthetic  
10 benefits that are real, although very difficult to  
11 quantify. Okay?

12 Thank you.

13 MS. SKOPECK: Thank you very much.

14 MR. SCOTT: Good evening, everyone. I want to thank  
15 the Army Corps for sitting through all of our public  
16 comments.

17 MS. BENSON: My name is Mary Benson. I'm here  
18 representing the Los Angeles Equine Advisory Committee  
19 and while there aren't a lot of horses in many of the  
20 areas of this proposed restoration, those natural surface  
21 trails for walking and as wildlife corridors serve many  
22 purposes. That's why we're here supporting  
23 Alternative 20.

24 Something during the presentation that struck me  
25 was you were talking about that incremental cost for the

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1 elevator to go all the way to the top. I'd like to  
2 extend that comparison and say the penthouse is the top  
3 floor. It commands a top price. We're not visitors  
4 taking an elevator on a trip. We are its residents and  
5 we want the penthouse to be included in that series of  
6 alternatives.

7           When you take a look at the number of people  
8 divided by that billion dollars, I would like you to take  
9 that as an -- as that cost on Alternative 20 and compare  
10 it to other Army Corps projects in areas along the  
11 Mississippi or other areas back east where that serves  
12 infinitesimally smaller populations. We need this  
13 because of the population, and we continue to grow. We  
14 need open spaces and we need Alternative 20.

15           Thank you very much.

16           MS. SKOPECK: Thank you.

17           MS. SCHLICK: Hello. I'm speaker number 59, for  
18 everybody behind. My name is Alison Schlick. I grew up  
19 in L.A. and Orange County and I now live in San Diego and  
20 some of my family does still live in the L.A. River  
21 watershed. I'm interested in this whole project. It  
22 was -- it's very exciting to me. I'm a law student. I'm  
23 studying it, but I also wanted to share my opinion and  
24 just from coming here and reviewing everything tonight,  
25 it seems clear everyone wants Alternative 20. And as

45

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1 someone that doesn't live in L.A. currently, I wanted to  
2 offer my perspective on someone that would be coming  
3 through or visiting family in the area as a tourist  
4 bringing tourist dollars, and having a fun place to stop  
5 on the 5 would be great for the region in L.A. other than  
6 having to, you know, stop at a gas station.

7           So it would be really great to be able to stop  
8 at some of these enticing areas that look kind of nice  
9 right now but need to be made accessible, and the only  
10 concern I would have, and so I want to echo what some of  
11 the previous speakers have talked about, is

12 Alternative 20 appears to be the most inclusive project  
13 to make this as sustainable, liveable for the communities  
14 and turn blighted areas into a vibrant, connected  
15 system. I think that was an excellent point someone made  
16 about San Francisco appears to be a very excellent  
17 connected system and L.A. is lacking that, and this could  
18 be that tipping point, that connected. So not only for  
19 the environmental aspects and the habitat restoration for  
20 the animals which is good for all of us, but also for the  
21 human access this does, and it requires investment.

22           It seems like the paperwork did say to fully  
23 take out all of the concrete and put it back in its  
24 natural state, not even including property acquisition  
25 costs, would be over 7 billion. So the 1 billion does,

1 yes, seem kind of -- it seems like the highest of these  
2 options, but it's also the lowest of options that hadn't  
3 even been considered.

4 So the only question I have, which I don't think  
5 was adequately explained, although I could look more into  
6 the materials -- maybe it is in the materials -- why only  
7 11 miles are selected for revitalization? I was really  
8 surprised that not more maybe of the southern part is  
9 going to be revitalized. And could more miles be  
10 revitalized maybe down the road or could that just be put  
11 into the record to maybe -- someone -- a couple of people  
12 have brought up tonight that doing even more for the  
13 River would be great. Thank you.

14 MS. SKOPECK: Thank you.

15 Sir, what number are you?

16 MR. COLLINS: I am 63 and I think I'm about the  
17 caboose here. I am Craig Collins. I'm the president of  
18 the Silver Lake Reservoirs Conservancy and I want to  
19 thank the Corps, Colonel, Dr. Axt, Dr. Armstrong, and by  
20 the smiles I'm seeing after this very long hearing, I  
21 know that you're really appreciating the extraordinary  
22 quality of the comments we've been getting tonight. I  
23 hope the folks in Washington, D.C. are listening to that  
24 as well and I also really want to thank the tremendous  
25 work done by your consultant Tetra Tech. In record time

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1 that team did an incredible job. I haven't heard them  
2 mentioned tonight. They really did a great job.

3 So Silver Lake people ask me why Silver Lake  
4 relates to the L.A. River. I say, Ask the great blue  
5 herons who feed in the L.A. River and nest at Silver  
6 Lake. That is really the core of the connection that's  
7 there.

8 Anyway, Silver Lake is about to go off-line and  
9 no longer part of the DWP system. We have a tremendous  
10 opportunity for Silver Lake to become part of the River's  
11 stormwater management, riparian viability, and ability to  
12 access recycled water of reduction of needs for a very  
13 expensive and vital commodity.

14 Moreover, I think it's important to step back  
15 and take a look at what happens when we revitalize a  
16 river and reconnect people with their waters. This is  
17 the experience that has been seen in places from Portland  
18 where I lived in the '70s and they tore down a freeway  
19 that separated downtown from the river and that began the  
20 transformation from a sawdust-and-rust town to Portland,  
21 and now we have seen that kind of experience in places  
22 from Seoul, Cleveland, Shanghai, Madrid, places that have  
23 found what the real power of a river is when you connect  
24 people to it. That is what we're talking about here:  
25 Economic resurgence, the quality of life, the

1 transformation in people's lives.

2 It is time for L.A. to discover that experience  
3 and to see what's going to be happening in this century.  
4 Thank you all very much. We're going to make this thing  
5 happen.

6 MS. SKOPECK: Thank you.

7 Okay, sir.

8 MR. MORRISON: Thank you. I'm number 65. I'm  
9 actually with the California GOP so that gives me more  
10 time. I think I'm going to remove this microphone. I  
11 don't like the way it's sitting.

12 Actually, I'm William Rodriguez Morrison with  
13 the California GOP representing the 24th Senate District.

14 Now, I followed this River plan for the last 12  
15 years when I ran for City Council. Now I'm glad the Army  
16 Corps of Engineers is here to make sure this job is done  
17 correctly. I know we had a couple former City Council  
18 members that spoke. When I ran for City Council, I also  
19 got the tour of the western region which included  
20 Lake Havasu with Senator John McCain at the time.

21 Now, this project, I'm just hoping -- City of  
22 L.A. already pays enough taxes to the Federal government.  
23 We have the highest sales taxes. I'm hoping the Army  
24 Corps of Engineers takes this into consideration in using  
25 the region, western region, funds from San Antonio,

47

48

1 Lake Havasu, to build this project in the city of L.A.,  
2 one of the largest cities, but we build other projects in  
3 other cities. I know it's going to take away from  
4 Arizona. It's going to take away also from San Antonio,  
5 but this city is a fighting city in its creation of the  
6 L.A. River and I'm hoping our tax dollars don't go up,  
7 because nobody's mentioning the tax dollars here and  
8 that's one major important thing.

9 This City's already suffering with businesses  
10 that I represent, that I speak to, business owners, and  
11 nobody's talking about it. I'm a property owner. I pay  
12 enough taxes and they're not going to the right funds.

13 This project when it first started, all the  
14 funding and all the hype from all these City officials  
15 didn't go to where it was supposed to go. It really  
16 upset me for the last 12 years. I just lost the City  
17 Council race against Gil Cedillo, but I'm running for  
18 Senator and next year I will win the Senate seat with the  
19 people in this room that believe in me and this community  
20 that has believed in me for 51 years in living in this  
21 community and being the block captain for Neighborhood  
22 Watch for 31 years.

23 I stand for my community strong and I'm going to  
24 be direct and I'm asking not to charge the City any more  
25 taxes for this project. It was well deserved a long time

1 ago and we don't need no more funding of higher taxes.  
2 We have the funding that you can take from other states.  
3 I'm saying use the western region funds to complete this  
4 project. Thank you.

48

5 MS. SKOPECK: Thank you.

6 Ma'am?

7 MS. BARNETT: Hi. My name is Karen Barnett and I'm a  
8 resident of Atwater Village and I'm just conflicted about  
9 all this because I feel like a lot of details aren't on  
10 the community level so we don't know what it's going to  
11 do to our flood insurance, what it's going to do traffic  
12 wise with people coming into our neighborhood.

49A

13 Who are we going to call to get things fixed,  
14 because there is no centralized point, so we have to  
15 either speak to the County, the City or the Flood  
16 Control.

49B

17 And then just for the health of everybody and  
18 Los Angeles in general, it seems kind of silly to let all  
19 that water flow into the ocean if we have an opportunity  
20 to refill our water tables or the aquifers. It seems  
21 like a pretty smart thing to do.

49C

22 Then going back to the community, it becomes  
23 troubling when we ask questions about who is going to  
24 maintain and pay for all this and who is going to do the  
25 security, who is going to patrol it, 'cause currently

49B

1     there's not much.   That's it.   Thank you.

2             MS. SKOPECK:   Thank you.

3             MS. LANDREGAN:   Hello.

4             MS. SKOPECK:   Good evening.

5             MS. LANDREGAN:   I'm number 69.   I may be your last  
6     speaker.   My name is Stephanie Landregan.   I'm a  
7     landscape architect.   I've been very fortunate to do very  
8     many projects along the L.A. River and its tributaries.  
9     I also am a Planning Commissioner for the City of  
10    Glendale.   But more importantly, I live in a watershed  
11    and this is why I'm here talking for Alternative 20  
12    because it is the most watershed-responsive alternative.

13            We spent over a billion dollars to add more  
14    parking spaces to the 405.   Now, frankly, we have  
15    realigned our priorities in the city of L.A. and the  
16    other adjacent cities, Glendale, and we believe that we  
17    need to put as much money into our natural processes as  
18    to our unnatural processes.   I am here to encourage the  
19    Corps to take this message back to Washington.   I will  
20    call my friends in other states and have them talk to  
21    their Senators, to talk to their Representatives, because  
22    this is nationally important.

23            We need to do the very best we can in bringing  
24    this River back to the people and to nature and part of a  
25    natural system.

1           Thank you very much. I really appreciate all  
2   you've done and I loved the animal cookies. That's why  
3   I'm still here. Thank you so much.

50

4           MS. SKOPECK: Thank you.

5           Is that the last person? Okay.

6           COL. COLLOTON: So for everyone who's left and for  
7   those that may hear this on the taped videostream that we  
8   conducted, we want to thank the Mountains Recreation and  
9   Conservation Authority for allowing the public meeting to  
10  be held here tonight free of charge, so no taxes were  
11  increased for the use of this facility tonight and it was  
12  very generous for them allowing us to have this location,  
13  very accessible, and keep it open so we could continue  
14  the meeting until we were able to hear everyone that  
15  wanted to speak.

16          Again, thank you. I want to thank everyone that  
17  stayed, everyone that spoke, everyone that made a  
18  comment; and, you know, our collective teams, the City of  
19  Los Angeles, the Corps of Engineers, and many others out  
20  here have spent many, many years -- Lewis, many, many,  
21  many years. You're probably one of the ones people  
22  referred to a lot, but many people have been working on  
23  this for a long time, this study today, being able to  
24  present it to you. I think everybody is really proud of  
25  that and appreciated the feedback.

1           So thank you very much and if you have more to  
2 say, please go to our website. There's still  
3 opportunities to comment. Until the 18th of November,  
4 we're taking public comments and we are welcoming every  
5 one of those. So thank you very much.

6           (Proceedings concluded at 8:25 p.m.)

Los Angeles River Ecosystem Restoration Integrated Feasibility Study  
Public Meeting – October 17, 2013  
Comment Card Summary

**Michael Banner, Los Angeles LDC, Inc.**

Approve Alternative 20

**Lynn Brown, L.A. Equine Advisory Committee – V.P.**

We support the LA River Revitalization plans. We urge this committee to include dirt trails for horses along the river. Much planning has been done for rec/bike paths, but equestrians have largely been ignored. We are a large group who wish to be included in future planning. Thank you.

**Tsilah Burman**

We want a world-class river with most habitat and access. Rather than do something minor to appease, we should be investing for the future and create the most benefits for all, consistency with City's Master Plan and well worth the cost which will not only have tremendous environmental benefit but will spur greater tourism and economic development. Please, please, please choose Alternative 20! Reasonable is not good enough for the City of Los Angeles. Right the wrong by choosing Alternative 20!!!

**Suellen Cheng, Chinese American Citizens Alliance**

1. I support the full implementation of Alternative 20. 2. The Alternative 20 would include the most historic section of the City. It is within close proximity to the site of the ancient Tongva Native American village. They are the 1<sup>st</sup> people who access the LA River. The full implementation of Alternative 20 would bring back that significant historic root of Los Angeles to people who would benefit from this project. 3. I totally agree with the City leaders, "Let's not go halfway on this very heart and soul of our City." This is our only chance to make a right decision for this wonderful and long overdue project. Thank you for allowing us to voice our concerns and please support the alternative 20 idea and its implementation.

**Mike Hernandez, former City Councilman CD1**

Support of Alternative 20

**Alan Kumamoto, resident/HCNC**

I support option 20 that Councilmember Gil Cedillo favors.

**Joanne Kumamoto, Little Tokyo**

I support the alternative supported by Gil Cedillo #20.

**Ally Lambarri**

Hasn't anyone asked the point of view of the youth? We are affected as well. Everything seems like the "adult world" but it's not; kids matter too. Can't anyone ask a child their thoughts? I'm 14 years old.



I've seen this neighborhood change before my very eyes. I'll admit; I do approve. I would like to see the children of Atwater or District 13 speak rather than the adults for once.

**Mike Lowry, Cypress Park**

My question deals with the Corps' methodology in creating the units of value assigned to each study alternative. Specifically, the inclusion of neighboring communities of Glendale and Burbank as beneficiaries of Alt. 20 in my mind creates additional value in each unit, providing a greater benefit that your methodology may not recognize. I'd like to better understand your construction of these units and exactly what contributed to their value. Thanks.

**J. McQuiston**

This is an affront to good ecology. LA has to recycle its water, not provide a means to waste resource and pollute the ocean as well. If the water was from natural source it would have silt and clog the dam or river. \$1 Billion = 100 parks with athletic fields where LA desperately needs them. For health and safety, think about what you're proposing!

**David Rankell**

Do not alter the bottom or sides of the LA River. Do not let people play or recreate near the river. The river is "designed" to rapidly and safely evacuate water out of the S.F. Valley and Los Angeles! It's a danger to the public when it's running full. People have died in and along the river (Floods of 1938) before it was a concrete channel. Leave it alone. It works and foolish under educated people want it changed and have no idea what it is capable of with a 100 year flood!!!

**Rourk Reagan**

For #20. 1. More permeable surface area allows more water recharge to our groundwater (aquifers). 2. We have worked for decades to revitalize our River. 3. Living in a concrete jungle with one of the largest cities in the world; we deserve more. 4. Just the environmental benefits, connecting the Elysian, the River & Griffith Park would be amazing. 5. With all of the new density building along the corridor, we could use the Quimby Pools to help and the residents will have a beautiful recreation area.

**Delmer E. Sanburg, Jr.**

The LA River ecosystem is priceless and should be preserved/restored as completely as possible. Alternative 20 is closest to this. Include both natural aspects as well as cultural and historical assets in the restoration and preservation of this unique area that compliments the hillsides in Griffith Park.

**Thomas Edward Sebahar, Activist**

The fact that this meeting took place is exciting. But concerns: 1) Pollution of local aquifers, 2) Potential West Nile problem and c'mon the cost. Mayor Garcetti needs to initiate a volunteer "City Corp" program. I'll help!

**Cheri Shankar**

Yes on Alternative 20!

**Rhoads Stephenson**

Go with Option 20!

**Ric Taylor**

Please consider Alternative 20! If we're going to do this, let's do it right the first time. Thanks for considering.

**Alexia Teran**

The acoustics need to be working. There should have been loud speakers along the walls. There were about 1000 people and most of us couldn't hear anything. The public was very disruptive, talking loudly. Improve the sound systems at the River Center. Speakers need to speak louder, please. Will this improvement bring higher taxes to property owners? In what other ways will this impact the area? I am for bettering the area and river; I always believe in educating the public about keeping the river clean.

**Ann Walnum, Friends of the Southwest Museum Coalition**

Alternative 20 would provide the best opportunities for Los Angeles and its residents. Let's do the plan right. Many meetings, studies, and hopes have gone before. It's TIME!

**Wendy Wendlandt, Environment California**

I support Alternative 20. Make LA Beautiful.

**Nicholas J. Wilhelm**

I am for the expanded proposal (20). It would serve the public with more access and more environmental protection. Recreation would also be incorporated into a more holistic service to the public. This River has been abused and ignored too long. It is time to return it to a viable river ecosystem and great public interface with nature!

**Erik Yesayan, Walk Bike Glendale**

As a long time Glendale resident and frequent user of the LA River bike path, I wholeheartedly support alternative 20. This alternative will allow the 200,000 Glendale residents access to a restored wildlife ecosystem that we otherwise lack in incredible ways. Most of southern Glendale is extremely delinquent in park space. Kids grow up instead exposing themselves to the dangers of playing on the street. Alt. 20 will be an outstanding benefit for Glendale residents.

**Rubi Zuniga**

Please identify the state and local funding opportunities and how Alternative 20 will affect local cost to residents of Los Angeles. In addition, please identify where the sources of income/resources will come from and if it will affect (specifically cut) current programs in order to allocate resources to carry on Alt 20. If so, please list the programs tentatively being affected as a result of Alt 20.

## 2. Responses to Comments on the Draft Integrated Feasibility Report

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### Introduction

This document, Appendix L, Part 2, constitutes the second part of a two part document which includes: Part 1 - Comments on the Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report (Feasibility Study and Environment Impact Statement/ Environmental Impact Report) (Draft IFR); and Part 2 - Responses to Comments on the Draft IFR. This appendix is part of the Final Los Angeles River Ecosystem Restoration Integrated Feasibility Report (Feasibility Study and Environment Impact Statement/ Environmental Impact Report) (Final IFR).

Part 2, Responses to Comments on the Draft IFR, presents the Corps' and City's responses to the comments received on the Draft IFR during the public review period which ended on November 18, 2013. The Corps and the City of Los Angeles made the Draft IFR document publicly available on the Corps' website on Friday, September 13, 2013, opening the 45-day public review period. The Notice of Availability was published in Federal Register on October 4, 2013 which extended the public comment period an additional 2 weeks to Monday, November 18, 2013. In addition, comments were received at the Public Meeting held on October 17, 2013 at the L.A. River Center and Gardens Atrium.

Responses are provided for each comment letter received, in the same order as presented in Part 1, by groups: federal, state, county, city, and local representatives and agencies, and governmental entities, then organizations and businesses, followed by individuals in alphabetical order by the last name of the first signature. Each numbered response corresponds to the assigned comment number provided in Part 1. Some comments have been assigned a letter code, which corresponds to a specific topic. For each of these topics, a General Response has been prepared and is listed below. A specific response has been provided for all other comments.

The definition of acronyms that may appear in the response to comments may be found immediately following the Table of Contents in the main report of the Final IFR.

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## **General Responses**

Responses to issues and concerns raised by multiple comments are addressed in a set of General Responses (GR-A and GR-B) as described below. All other responses are presented individually by comment letter.

### **GR-A Support for Alternative 20**

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles (“City” or “non-Federal sponsor”) for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the final alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes regional terrestrial and aquatic habitat connections. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the plan recommended for authorization.

Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, as the largest of the final array plans, it will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, these benefits are generated at a very high cost, especially for the cost compared to the NER Plan. From a Federal interest perspective, the primary focus of the project is ecosystem restoration, not regional economic output. In an ecosystem restoration feasibility study the NER Plan must be identified. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects are worth the incremental costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. The NER plan determines Federal interest and forms the basis of cost-sharing for the recommended plan. In this case, the NER Plan was identified in the Draft IFR as Alternative 13, and was named the ARBOR Corridor Extension (ACE) plan. It was selected as the Tentatively Selected Plan (TSP) based on evaluation criteria established in the feasibility study and mandated by governing federal water resources policy.

The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by those two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

During the public comment period for the Draft IFR, which closed on 18 November 2013, the Corps received and evaluated nearly 500 comments. Comments were received from Federal agencies including the U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (FWS), Department of Interior (DOI), and the Urban Waters Federal Partnership.



Comments were also received and evaluated from State and local agencies, Non-Governmental Organizations (NGOs), other interest groups, elected officials, and private citizens.

- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
  - Scope of the recommended plan
  - Support for Administration's Urban Waters Federal Partnership initiative
  - Compliance with WRDA 2007 requirements to reflect the City's LA River Revitalization Master Plan
  - Acceptability to sponsor and stakeholders
  - Connectivity benefits associated with individual plans
  - Habitat Model used to calculate benefits (CHAP)
  - Environmental justice
  - Inclusion of Union Pacific Rail Road Yard (LATC) site
  - Global scarcity of subject habitat type(s)

The Final IFR's Comments Appendix Lincludes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

In general, while agency and stakeholder comments provided a large amount of technical input and analysis regarding the regional importance of Alternative 20, much of this information had already been taken into account in identifying Alternative 13 as the NER plan in the Draft IFR. However, as a result of these comments and input from reviews, the Corps used a framework suggested by an Independent External Peer Review (IEPR) panel to better quantify the beneficial outputs of connectivity. By evaluating hydrologic, local, and regional connectivity and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array (See response GR-B for more detail). Although quantifying connectivity showed more restoration output for each of the alternatives as well as for differing combinations of key features, the increase in cost between Alternative 13 and the next best buy plan was over \$100 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits (after quantifying connectivity functions), there was not sufficient justification to select a larger scale plan as the NER Plan.

Following public review, further detailed cost analysis was performed, which identified a more cost effective variation on Alternative 13 (referred to in the Final IFR as "Alternative 13v" for "variation"). Alternative 13v is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20, which provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park, daylighting three streams, and restoration of the confluence of Arroyo Seco. The Reach 7 plan from Alternative 20 provides greater benefits at a lower cost than the Reach 7 plan included in Alternative 13. Alternative 13v provides the greatest amount of ecosystem restoration output for the investment cost; in other words, there is no other plan of similar cost that produces more restoration output. Furthermore, compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for cost effectiveness, efficiency, acceptability, and completeness. Accordingly, Alternative 13v is identified as the NER Plan in the Final IFR.

In a letter dated April 10, 2014, the City of Los Angeles requested selection of Alternative 20 as the Recommended Plan at a cost-share scenario different from traditional Corps policy. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and the Recommended Plan in the Final IFR. By memo dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exemption and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

The LPP, Alternative 20, would include additional restoration benefits beyond those identified for the NER plan, with widening and terracing in Reach 5 in the Glendale Narrows, restoration at Verdugo Wash, and expansion of restoration at and adjacent to the Los Angeles Trailer and Container Intermodal Facility (LATC) site. These additional restoration benefits include restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and opportunity for a direct connection to the significant ecological area of the Verdugo Mountains. The LPP is most consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles because it includes three of its five opportunity areas (versus Alternative 13v's inclusion of two). Implementation of the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

The following table provides a comparison of the NER Plan and the LPP. It includes a comparison of the acres restored and average annual habitat unit outputs (AAHUs), describes major restoration features in each of the 8 reaches, and summarizes connectivity benefits. The cost associated with the 121 additional acres in Alternative 20 is relatively high, because the acres are restored through modifications to the river channel by removing concrete or reconfiguring channel walls, and by widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 restores about 20% more overall acreage and twice the acreage of local and hydrologic connectivity as Alternative 13v, and is the only alternative that provides a connection to the significant ecological area of the Verdugo Mountains.

**Table 1 – NER and LPP Comparison**

<b>Criteria</b>	<b>NER Plan (Alternative 13v)</b>	<b>LPP (Alternative 20)</b>	<b>Incremental Difference</b>
Acres	598	719	121
AAHU's	5,989	6,782	793
First Cost	\$694 Million	\$1.339 Billion	\$645 Million
<b>Comparison of Restoration Features</b>			
<b>Reach 1</b>	Habitat corridor/riparian planting	Same as NER Plan	-
<b>Reach 2</b>	Habitat corridor/riparian planting	+ Channel widening right bank	20 acres 55 AAHU
<b>Reach 3</b>	Side channel/daylighted streams/habitat corridor	+ Verdugo Wash confluence restoration	30 acres 130 AAHU
<b>Reach 4</b>	Daylighted streams/side channel/habitat corridor	Same as NER Plan	-

<b>Reach 5</b>	Habitat corridor/daylighted stream	+ Widening channel/terracing banks	27 acres 265 AAHU
<b>Reach 6</b>	Habitat corridor/widening river	Same as NER Plan	-
<b>Reach 7</b>	Daylighted streams + Arroyo Seco restored + Connection to Los Angeles River State Historic Park with 10 acres of wetlands/habitat corridor	Same as NER Plan	
<b>Reach 8</b>	Riparian overbank/restored wash/habitat corridor	+ Concrete removal, off channel wetlands, hydrologic connection	44 acres 342 AAHU
<b>Connectivity Benefits</b>			
<b>Local</b> (acres)	142	298	156
<b>Regional</b> (acres)	780,000	797,000	17,000
<b>Hydrologic</b> (acres)	133	280	147
<b>Hydrologic</b> (count)	2	4	2

### GR-B Connectivity

Many public comments received, as well as a comment from the project's Independent External Peer Review (IEPR) Panel, suggested that an additional analysis of connectivity benefits would assist with alternative comparison and selection. The Corps used a framework suggested by the project's IEPR panel to better quantify the beneficial outputs of connectivity. Four different metrics were developed to further quantify different connectivity outputs. By evaluating two hydrologic, one local, and one regional connectivity metrics, and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array.

Local connectivity was evaluated based on the potential for wildlife to physically move between the river and areas restored by the project. The metric is based on the acreage of the restored sites and the ability of wildlife to access them. For the purpose of this evaluation, it was assumed that all types of wildlife must have access in order to be considered in the metric (i.e. mammals, reptiles, and amphibians, in addition to birds whose movements are not limited by barriers between the channel bottom and restored areas).

Regional connectivity was evaluated based on the restored opportunities for wildlife to move out of the restored project area into adjacent, more distant significant ecological areas (now or in the future, after additional restoration occurs along river tributaries). This metric is based on the acreage of habitat area to which a given alternative connects. Areas considered include the Santa Monica Mountains (via Griffith Park) and Elysian Park, which constitute terrestrial connections, and potential future opportunities via tributaries to the San Gabriel Mountains (via Arroyo Seco) and the Verdugo Mountains (via Verdugo Wash), which constitute aquatic connections.

Hydrologic connectivity was evaluated based on the restored areas/floodplain that would be reconnected to the river via natural hydrology. The total acreage of the sites with a natural hydrologic connection and the number of sites with a natural hydrologic connection were evaluated (two separate metrics). Parcels were considered hydrologically connected if the river is widened into a floodplain area, where the river can more naturally flood, meander, change shape, and interact with adjacent sites. The floodplain is considered to be the area where floodwaters would be allowed to inundate.

For each metric, the values for each site (i.e. acres or count) were calculated and then summed across each alternative. In order to calculate the metric value, a Relative Value Index (RVI) was used, whereby the total for a given alternative was divided by the maximum possible value. In this way, the metric value is a simple proportion of the total possible, on a scale of 0 to 1 (1 being the maximum).

To obtain an overall connectivity metric, the metric values for each connectivity component were then summed, and an RVI calculated to determine a single, combined connectivity metric (see Table 1). These combined metric values were then input into the economic analysis (CE/ICA) and weighted at varying levels using the Combined Habitat Assessment Protocol (CHAP) outputs. The original analysis only considered the CHAP analysis in the quantitative comparison and resulted in all four Final Array Plans included in the Draft Integrated Feasibility Report (IFR) (10, 13, 16, and 20) being Best Buy Plans. In the revised analysis, two additional scenarios were evaluated that based the CE/ICA analysis on a Total Weighted Output Metric that included CHAP and connectivity benefits. The first weighted the CHAP and Combined Connectivity equally, and the second weighted the CHAP at 75% and Combined Connectivity at 25%. These results were consistent in showing Alternative 13 as the first Best Buy Plan.

Although quantifying connectivity showed more restoration output for each of the alternatives, the increase in cost between Alternative 13 and Alternative 16 is over \$350 million, and the increase in cost between Alternative 13 and Alternative 20 is over \$627 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits, there was not sufficient justification to select a larger scale plan as the NER Plan.

**Table 1 – Connectivity Metrics**

	RVI - Connectivity Metrics					Connec- tivity Metric Value	First Cost \$M*	Incremental Cost \$M*
	Local Connec- tivity	Regional Connec- tivity	Hydrologic Connec- tivity - acres	Hydrologic Connec- tivity - count	Total			
Alt 10	0.30	0.22	0.29	0.25	1.06	0.26	\$ 375	
Alt 13	0.48	0.98	0.48	0.50	2.43	0.61	\$ 453	\$ 78
Alt 16	0.86	0.98	0.88	0.75	3.46	0.87	\$ 804	\$ 351
Alt 20	1.00	1.00	1.00	1.00	4.00	1.00	\$ 1,081	\$ 277

\* First costs and incremental costs shown are from the September 2013 Draft IFR. Costs were updated in the Final IFR.

Following public review, further detailed cost analysis was performed, which identified a more cost effective variation on Alternative 13 (referred to in the Final IFR as “Alternative 13v” for variation). Alternative 13v is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This variation is identified as the NER plan in the Final IFR. With respect to connectivity, Alternative 13v provides similar benefits to Alternative 13, with a slight increase in local and regional connectivity with the restoration at the Los Angeles State Historic Park in Reach 7.

The Corps recognizes that Alternative 20 has the most benefits, across many benefit categories, among the final array plans. Accordingly, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) (ASA (CW)) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA (CW) granted the requested LPP exception, and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

## **Specific Response**

### ***Federal Agencies and Representatives***

U.S. Senate Committee on Environmental and Public Works, Senator Barbara Boxer



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS  
441 G STREET, NW  
WASHINGTON, DC 20314-1000

The Honorable Barbara Boxer  
Chairman of Committee on Environment and Public Works  
Washington, D.C. 20510-6175

Dear Senator Boxer:

Thank you for your comments on the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the final alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and is the Recommended Plan in the Final Integrated Feasibility Report (IFR) and in the Chief of Engineers Report.

In a letter dated April 10, 2014, the City of Los Angeles requested selection of Alternative 20 as the recommended plan at a cost-share scenario different from traditional U.S. Army Corps of Engineers (Corps) policy. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and the Recommended Plan in the Final IFR. By memo dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exception, and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

After detailed cost analysis, the Corps also refined the NER plan. That refined plan, Alternative 13v, provides the greatest amount of ecosystem restoration output for the investment cost; in other words, for the total project cost for Alternative 13v of \$694 million, there is no other plan of similar cost that produces more restoration output. Accordingly, Alternative 13v is identified as the NER plan in the Final IFR. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Alternative 20 has been identified as the LPP and Recommended Plan for the reasons previously stated.

As part of her permission to the Corps to consider Alternative 20 as the LPP, the ASA(CW) permitted the Corps to consider alternative cost sharing.

If you have any further questions, please contact the Los Angeles District Commander, Colonel Kimberly M. Colloton, at (213) 452-3961, or your staff may contact the Deputy District Engineer for Project Management, Mr. David M. Van Dorpe, at (213) 452-3971.

Sincerely,

Steven Stockton  
Director of Civil Works



## **Attachment 1**

The following information provides a more detailed explanation for the selection of the National Ecosystem Restoration (NER) Plan and the Locally Preferred Plan for the proposed Los Angeles River Ecosystem Restoration Project.

### **Acceptability and Public Support**

During the public comment period for the Draft Integrated Feasibility Report (IFR), which closed on 18 November 2013, the Corps received and evaluated nearly 500 comments. Comments were received from Federal agencies including the U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (FWS), Department of Interior (DOI), and the Urban Waters Federal Partnership. Comments were also received and evaluated from State and local agencies, Non-Governmental Organizations (NGOs), other interest groups, elected officials, and private citizens.

- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
  - Scope of the recommended plan
  - Support for Administration's Urban Waters Federal Partnership initiative
  - Compliance with WRDA 2007 requirements to reflect the City's LA River Revitalization Master Plan
  - Acceptability to sponsor and stakeholders
  - Connectivity benefits associated with individual plans
  - Habitat Model used to calculate benefits (CHAP)
  - Environmental justice
  - Inclusion of Union Pacific Rail Road Yard (LATC) site
  - Global scarcity of subject habitat type(s)

Alternative 13, the NER plan identified in the Draft IFR, met required criteria for completeness, effectiveness, efficiency, and acceptability. This alternative is complete in that it provides for all features necessary to realize the planned effects, is effective in that it meets study objectives to alleviate problems and realize opportunities while being efficient, as described above. This alternative was evaluated for acceptability from the perspective of the Nation's general public, and is consistent with Federal law, authority and public policy. In general, in terms of scope and completeness of the recommended plan, agency and stakeholder input did not provide any new information to the Corps that had not been previously considered in reaching its selection of Alternative 13 as the NER Plan.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in the Final IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in

Alternative 13, at a lower cost. This variation on Alternative 13 has been identified as the NER plan in the Final IFR on the basis of the analysis referenced above.

In a letter dated April 10, 2014, the City of Los Angeles requested that Alternative 20 be the Recommended Plan. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memorandum dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exception and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report. The rationale for granting that request is described below.

The LPP would include additional restoration benefits above that identified for the NER plan at Verdugo Wash, and at the Los Angeles Trailer and Container Intermodal Facility (LATC) site, as well as river widening in additional reaches. These additional restoration benefits include direct restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and provision of a direct connection to the significant ecological area of the Verdugo Mountains. Nearly unanimous support for Alternative 20 was expressed by the public through review of the Draft IFR and public meetings. Alternative 20 is consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles. Implementation of Alternative 20 as the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

Over the last 150 years, the Los Angeles River has been degraded by development, flooding, and channelization, including the Corps construction of the Los Angeles County Drainage Area (LACDA) flood risk management project that modified most of the Los Angeles River with concrete banks and a mostly concrete bed to protect the city and surrounding areas from catastrophic flooding. The Flood Control Acts of the 1930s and 1940s directed the Corps to construct the LACDA project, which ultimately involved construction of 5 dams and approximately 500 miles of channels to protect communities from significant and recurring flood damages. Restoration of 11 miles of the Los Angeles River, that is the focus of the present Study, is within the footprint of the existing flood risk management project. The ecosystem project would, in part, reverse a portion of the degradation associated with the existing LACDA project, and would advance a number of important Administration efforts, including the Climate Action Plan, America's Great Outdoors initiative, and the Urban Waters Federal Partnership. The Corps has factored in climate variability and future uncertainties, and with a more naturally functioning channel, there may be associated incidental benefits with respect to drought, such as increased percolation area and increased detention and retention characteristics. The America's Great Outdoors initiative would be advanced through provision of increased access to restored lands and urban waters. Lastly, the Los Angeles River is one of 7 original pilot locations for the Urban Waters Federal Partnership, and the proposed restoration activities would advance the goals of restoring the ecosystem and balancing revitalization with flood avoidance to ensure public safety for the 11 miles of 51 miles of the Los Angeles River that are the focus of the partnership work.

Quantification of the connections among restored areas demonstrate the significant benefits to be realized through implementation of the LPP in lieu of the NER plan. Restoration of such

connections will involve modifications to the urban river channel by removing concrete and reconfiguring channel walls, and by widening the channel to restore hydrologic connectivity and additional wetland habitat. The LPP would also provide significantly greater regional economic benefits, including over 11,000 more jobs and over \$3.8 billion in labor income, as well as substantive opportunities for redevelopment in the Verdugo Wash area. Environmental justice benefits would also be realized through restored community cohesion for communities previously separated by the existing LACDA flood risk management project, through provision of new public access to restored natural areas with associated recreational amenities.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite provided by interaction with nature.

### **Significance of Ecosystem Outputs**

Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, Alternative 20, as the largest of the final array plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, from a Federal interest perspective, the primary focus of the project is ecosystem restoration and the NER Plan must be identified in a restoration feasibility study as a primary basis for decision making. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects just equal or exceed incremental costs, or where any extra environmental value is just worth the costs.

Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. The NER plan determines Federal interest and forms the basis of cost-sharing for the recommended plan. In this case, the NER Plan in the Draft IFR was identified as Alternative 13, named the ARBOR Corridor Extension (ACE). It was selected based on the required criteria used to assess and establish selection of the NER Plan. The increased benefits for habitat value, local/nodal and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion

in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Regarding comments relating to connectivity, these outputs were considered in the evaluation and comparison of alternatives. Further, in response to Independent External Peer Review comments, connectivity benefits were quantified in greater detail, combined with habitat outputs from the CHAP model and subject to additional cost effectiveness and incremental analyses. Such analysis substantiated that the incremental costs per output are significantly higher for Alternative 20, and therefore, when considering the criterion of reasonableness of cost, Alternative 13v is affirmed to be the NER Plan in the Final IFR.

The following table provides a comparison of the NER Plan and the LPP. It includes a comparison of the acres benefiting from the restoration and average annual habitat unit outputs (AAHUs), describes major restoration features in each of the 8 reaches, and summarizes connectivity benefits. The cost associated with the 121 additional acres in Alternative 20 is relatively high, because the acres are restored through modifications to the river channel by removing concrete or reconfiguring channel walls, and by widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 restores 22% more overall acreage and twice the acreage of local and hydrologic connectivity as Alternative 13v, and is the only alternative that provides a connection to the significant ecological area in the Verdugo Mountains

**Table 1 – NER and LPP Comparison**

<b>Criteria</b>	<b>NER Plan (Alternative 13v)</b>	<b>LPP (Alternative 20)</b>	<b>Incremental Difference</b>
Acres	598	719	121
AAHU's	5,989	6,782	793
First Cost*	\$694 Million	\$1.339 Billion	\$645 Million
<b>Comparison of Restoration Features</b>			
<b>Reach 1</b>	Habitat corridor/riparian planting	Same as NER Plan	-
<b>Reach 2</b>	Habitat corridor/riparian planting	+ Channel widening right bank	20 acres 55 AAHU
<b>Reach 3</b>	Side channel/daylighted streams/habitat corridor	+ Verdugo Wash confluence restoration	30 acres 130 AAHU
<b>Reach 4</b>	Daylighted streams/side channel/habitat corridor	Same as NER Plan	-
<b>Reach 5</b>	Habitat corridor/daylighted stream	+ Widening channel/terracing banks	27 acres 265 AAHU
<b>Reach 6</b>	Habitat corridor/widening river	Same as NER Plan	-
<b>Reach 7</b>	Daylighted streams + Arroyo Seco restored + Connection to Los Angeles	Same as NER Plan	-

	River State Historic Park/habitat corridor		
<b>Reach 8</b>	Riparian overbank/restored wash/habitat corridor	+ Concrete removal, off channel wetlands, hydrologic connection	44 acres 342 AAHU
<b>Connectivity Benefits</b>			
<b>Local</b> (acres)	151	298	147
<b>Regional</b> (acres)	780,000	797,000	17,000
<b>Hydrologic</b> (acres)	133	280	147
<b>Hydrologic</b> (count)	2	4	2

\* First costs shown are from the September 2013 Draft IFR and are subject to change.

## Environmental Justice

Although environmental justice was not a key criterion in the plan selection process, the Final IFR includes a more robust analysis of environmental justice issues in Section 3.13.3 and 5.13. Many other project outputs were identified for consideration by the public (such as water quality, groundwater recharge, recreation, and regional revitalization), which under Corps policy were not primary criteria for identifying the NER plan. The rationale for the LPP as the Recommended Plan is provided above.

## Cost

When selecting a plan to propose for authorization, the Corps must consider not only NER benefits, but also the reasonableness of costs necessary to achieve those benefits in comparing alternatives. Plan selection on this basis is required by Corps regulations and policy in Engineering Regulation 1105-2-100. The \$694 million cost of Alternative 13v is significant when compared to the Federal investment in other ecosystem restoration plans by the Corps in the Southwest, especially when calculated as cost per acre restored. The added areas of restoration in Alternative 20 did not increase benefits sufficiently to justify the added and almost doubled cost of \$645 million. Although quantifying connectivity showed more restoration output for each of the alternatives, there was not sufficient justification to select a larger scale plan as the NER Plan.

As you noted in your letter, because of the high lands, easements, rights of way, relocations, and disposal sites (LERRD) costs associated with the alternative plans, and the Corps' policy that plans have a target LERRD percentage of no more than 25 percent of total ecosystem restoration costs, the City of Los Angeles has offered to voluntarily waive reimbursement of all LERRD costs exceeding its statutory share of total ecosystem restoration costs. The ASA(CW) granted a policy waiver to allow the Corps to consider plans with higher LERRD costs and to allow the City to waive reimbursement of LERRD. As part of its request for Alternative 20, the City

confirmed its waiver of reimbursement and offered alternative cost sharing for the LPP. As part of her permission to the Corps to consider Alternative 20 as the LPP, the ASA(CW) permitted the Corps to consider alternative cost sharing, subject to sponsor waiver of reimbursement and credit for LERRD above 35 percent of total ecosystem restoration cost. The Chief of Engineers will make a decision on the cost sharing that will be recommended to Congress prior to submittal of the Chief's Report to Congress.

Accordingly, Alternative 13v is identified as the NER plan in the Final IFR. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan described above. However, Alternative 20 has been identified as the LPP and Recommended Plan for the reasons previously stated.

**Members of U.S. Congress, Bass, Becerra, Roybal-Allard**



**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

The Honorable Karen Bass  
The Honorable Xavier Becerra  
The Honorable Lucille Roybal-Allard  
The Honorable Adam B. Schiff  
Members of Congress  
4929 Wilshire Blvd, Suite 650  
Los Angeles, CA 90010

Dear Members of Congress:

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles (“City” or “non-Federal sponsor”) for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the Recommended Plan.

We recognize that Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, it is recognized that Alternative 20, as the largest of the final array plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, from a Federal interest perspective, the primary focus of the project is ecosystem restoration, and the NER Plan must be identified in a restoration feasibility study. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects equal the incremental costs, or where the extra environmental value is just worth the costs.

Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. The NER plan determines Federal interest and forms the basis of cost-sharing for the recommended plan. In this case, the NER Plan identified in the Draft IFR was Alternative 13, named the ARBOR Corridor Extension (ACE). It was selected based on the required criteria used to assess and establish the selection of the NER Plan. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives, provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.



During the public comment period for the Draft IFR, which closed on 18 November 2013, the Corps received and evaluated nearly 500 comments. Comments were received from Federal agencies including the U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (FWS), Department of Interior (DOI), and the Urban Waters Federal Partnership. Comments were also received and evaluated from State and local agencies, Non-Governmental Organizations (NGOs), other interest groups, elected officials, and private citizens.

- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
  - Scope of the recommended plan
  - Support for Administration's Urban Waters Federal Partnership initiative
  - Compliance with WRDA 2007 requirements to reflect the City's LA River Revitalization Master Plan
  - Acceptability to sponsor and stakeholders
  - Connectivity benefits associated with individual plans
  - Habitat Model used to calculate benefits (CHAP)
  - Environmental justice
  - Inclusion of Union Pacific Rail Road Yard (LATC) site
  - Global scarcity of subject habitat type(s)

The Final IFR's Comments Appendix includes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

In general, in terms of scope and completeness of the recommended plan, while agency and stakeholder comments provided a large amount of technical input and analysis regarding the importance of Alternative 20, the Corps considers this input to be similar to what had previously been considered in reaching the agency's identification of Alternative 13 as the Tentatively Selected Plan (TSP).

In terms of connectivity benefits and the model used to calculate benefits, the Corps used a framework suggested by an Independent External Peer Review (IEPR) panel to better quantify the beneficial outputs of connectivity noted as being not fully captured in the public comments. By evaluating hydrologic, local, and regional connectivity and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array.

Although quantifying connectivity showed more restoration output for each of the alternatives as well as for differing combinations of key features, the increase in cost between Alternative 13 and the next bigger best buy plan was over \$100 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits (after quantifying connectivity functions), there was not sufficient justification to select a larger scale plan as the NER Plan.

Following public review, further analysis was performed that included a more detailed cost analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7,

where it includes the Reach 7 features from Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

Alternative 13v provides the greatest amount of ecosystem restoration output for the investment cost; in other words, for the total project cost for Alternative 13v of \$694 million, there is no other plan of similar cost that produces more restoration output. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan. Accordingly, Alternative 13v has been identified as the NER plan.

In a letter dated April 10, 2014, the City of Los Angeles requested selection of Alternative 20 as the Recommended Plan at a cost-share scenario different from traditional Corps policy. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memo dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exception and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report. The rationale for granting that request is described below.

The LPP would include additional restoration benefits above that identified for the NER plan at Verdugo Wash, widening of the natural riverbed in 1.5 miles of the Glendale Narrows (Reach 5), and expansion of restoration at and adjacent to the Los Angeles Trailer and Container Intermodal Facility (LATC) site. These additional restoration benefits include direct restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and provision of a direct connection to the significant ecological area of the Verdugo Mountains. Nearly unanimous support for Alternative 20 was expressed by the public through review of the Draft IFR and public meetings. The LPP is consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles. Implementation of the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

Over the last 150 years, the Los Angeles River has been degraded by development, flooding, and channelization, including the Corps' construction of the Los Angeles County Drainage Area flood risk management project that modified most of the Los Angeles River with concrete banks and a mostly concrete bed to protect the city and surrounding areas from catastrophic flooding. The Flood Control Acts of the 1930s and 1940s directed the Corps to construct the Los Angeles County Drainage Area project, which ultimately involved construction of 5 dams and approximately 500 miles of channels to protect communities from significant and recurring flood damages. Restoration of 11 miles of the Los Angeles River, that was the focus of this IFR, is within the footprint of the existing flood risk management project. The ecosystem project would, in part, reverse a portion of the degradation associated with the existing Los Angeles County Drainage Area project, and concurrently advance a number of important Administration efforts, including the Climate Action Plan, America's Great Outdoors initiative, and the Urban Waters Federal Partnership. The Corps has factored in climate variability and future uncertainties, and with a more naturally functioning channel, there may be associated incidental benefits with

respect to drought, such as increased percolation area and increased detention and retention characteristics. The America's Great Outdoors initiative would be advanced through provision of increased access to restored lands and urban waters. Lastly, the Los Angeles River is one of 7 original pilot locations for the Urban Waters Federal Partnership and the proposed restoration activities would advance the goals of restoring the ecosystem and balancing revitalization with flood avoidance to ensure public safety for 11 miles of 51 miles of the Los Angeles River.

Quantifications of the connections among restored areas demonstrate the significant benefits to be realized through implementation of Alternative 20 in lieu of the NER plan. Restoration of such connections will involve modifications to the urban river channel by removing concrete and reconfiguring channel walls and widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 would also provide significantly greater regional economic benefits, including over 11,000 more jobs and over \$3.8 billion in labor income, as well as substantive opportunities for redevelopment in both the Verdugo Wash confluence and Chinatown/Cornfields areas. Environmental justice benefits would also be realized through restored community cohesion for communities previously separated by the existing Los Angeles County Drainage Area flood risk management project through provision of new public access to restored natural areas with associated recreational amenities.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

**Congresswoman Lucille Roybal-Allard**

Thank you for your letter. Please reference the congressional letter addressed to you above.

**Congressman Adam B. Schiff**

Thank you for your letter. Please reference the congressional letter addressed to you above.

**U.S. Department of the Interior**

1. Thank you for your comments and additional information to be considered for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 is one of the action alternatives considered in detail in the IFR. The Corps typically recommends the plan that is the National Ecosystem Restoration (NER) Plan. In this case, the NER Plan in the Draft Integrated Feasibility Report (IFR) was identified as Alternative 13, named the ARBOR Corridor Extension (ACE) alternative, because it met study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v is identified as the NER Plan in the Final IFR.

However, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) (ASA (CW)) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA (CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan;

these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite. The importance of passive recreation, and in particular multi-use trails, is recognized. The recreation plan that was initially developed to be compatible with Alternative 13 was adjusted to be compatible with and take advantage of the ecosystem restoration features included in Alternative 20. The recreation plan includes passive recreation opportunities comprised of trail improvements, pedestrian bridges, trail access points and wildlife viewing points that are compatible with the restoration features.

We appreciate the information you provided on (1) the Santa Monica Mountains National Recreation Area (SMMNRA), (2) the Rivers, Trails, and Conservation Assistance (RTCA) Program's current and past projects along the Los Angeles River, (3) the proposed project's location within the planning corridor for the Juan Bautista de Anza National Historic Trail through the Los Angeles region, and (4) the Los Angeles River's location in the study area for the Rim of the Valley Special Resource Study. We have incorporated this information into the report, as appropriate, in the section of the Final IFR that addresses resource significance.

2. During the engineering and design phases of the project, careful consideration will be taken to account for and take advantage of existing and ongoing recreational programs, studies and plans in the study area. As required by Corps policy, the project's recreation plan was developed after restoration features were planned and must be compatible with restoration features. During the detailed design phase, the Corps will ensure that recreational use is compatible with the more in depth design of restoration features, particularly limiting recreation to passive activities in restored widened areas.
3. Your support for Alternative 20 is noted. All applicable studies and projects will be considered in the Final IFR.

### **U.S. DOI Fish and Wildlife Service**

1. Thank you for your comments on the Los Angeles River Ecosystem Restoration Feasibility Study, identifying how it relates to important efforts of the Fish and Wildlife Service. We appreciate your commitment to working with Federal partners on river efforts.
2. Your support for Alternative 20 based on its relevance to your Connecting People with Nature initiative, outreach to underserved communities, and biodiversity is noted. The significance of the California Floristic Province is described in Section 2.1. See GR-A.

### **U.S. Environmental Protection Agency**

Thank you for your comments on the Los Angeles River Ecosystem Restoration Study and its relationship to Urban Waters Federal Partnership goals.

Responses to detailed comments:

1. Water quality and conservation benefits were qualitatively described in Section 5.4 of the Draft IFR. Water quality benefits (for human consumption purposes) are considered as ancillary, incidental benefits. Because the Corps mission and project objectives focus on ecosystem restoration, the benefits of habitat restoration are primarily considered. Improving water quality can only be an objective to the extent it is necessary to achieve ecosystem benefits. In this case, the quality and amount of water available is not the primary limiting factor that is precluding establishment of native habitats. Once the proposed modifications to the channel and overbank structures and topography are implemented, planting/seeding is established and water is redirected into these areas, then successful restoration should be achieved. Additional improvements that result from habitat restoration (i.e., filtration, infiltration, and removal of suspended sediments or contaminants through natural processes) are expected to occur, but are not the driving factors.

The Corps has coordinated with the Environmental Protection Agency (EPA) throughout the study process, and that coordination will continue as needed through design and implementation. The 404(b)(1) Evaluation that will be the basis for the Corps' request to the Regional Water Quality Control Board (Los Angeles Region - RWQCB) for Section 401 Certification is included in the Final IFR and is found in Appendix F. The Corps will include EPA in the 401 Certification process by providing copies of correspondence between the Corps and the RWQCB, to include a copy of the application for 401 certification.

2. Benefits of groundwater recharge were qualitatively described in Section 5.4 of the Draft IFR. These benefits were considered as ancillary, incidental benefits. Because the Corps mission and project objectives focus on ecosystem restoration, the benefits of habitat restoration are considered primary.

3. See GR-B.

4. Policy requires that the Corps consider potential climate change impacts when undertaking long-term planning, setting priorities, and making decisions affecting its resources, programs, policies, and operations. Per this requirement, the IFR has incorporated climate change in the existing conditions chapter in Section 3.2, in the impacts chapter in Sections 5.2 and 5.4, and in the Hydrology and Hydraulics Appendix (E), Section 9. Because it is difficult to quantify resilience of restoration measures to climate change, the Corps intends to design all restoration features with climate change resiliency built in. Because all restoration measures are designed to consider climate change resiliency, and because the nuances between levels of restoration are difficult to quantify, including them in the CHAP would provide little meaningful cost-benefit analysis. However, as your recommendation suggested, the Corps has and will continue to coordinate with the Bureau of Reclamation and the Los Angeles County Department of Public Works on the Los Angeles Basin Stormwater Conservation Study. The Corps provided period of record flows and other technical input in anticipation of having quantitative results applicable for use in the next phase of this study.

5. The environmental justice analysis has been expanded in the Final IFR to further address effects, including positive effects as recommended in the comment. See Section 5.13. Table 5-46 summarizes some of the differences among alternatives relative to social and environmental justice issues. The Corps will award construction contracts in accordance with the FAR, and will utilize small business programs including HUBZ one set asides where appropriate and practicable.

6. The Corps will consider such materials for use in recreation structures during the detailed design phase.
7. The paragraph on point and non-point sources has been clarified/corrected in Section 3.4.3 in the Final IFR.
8. Details pertaining to the San Fernando Valley Superfund sites have been edited as recommended in Section 3.4.4.
9. The last paragraph has been edited to state that "most" stormwater is untreated.
10. While recreation is not a primary project purpose, it is still considered one of the primary planning objectives evaluated in the study. Typo 2 will be corrected to 3 on p 4-3.
11. The 2012 MS4 permit will be referenced in Section 5.4.2.
12. Text has been edited as suggested in the comment.
13. Text has been edited as suggested in the comment.
14. As stated in Section 5.7.3 in the IFR, passenger rail would remain in place and continue to operate.
15. Comment noted. The fourth sentence in paragraph 1 has been changed as follows: " For contaminated groundwater that cannot be addressed prior to construction activities, such as the ..."
16. We have added a sentence to Section 5.11.3, as follows: "These temporary operations should also be consistent with current management of contaminated groundwater at SFVSS and Pollock Well Field." We will continue to coordinate with the EPA as the project proceeds.
17. The word "applicable" has been deleted from this sentence.
18. References to dewatering activities in the IFR have been reviewed for consistency. The sections 5.11.3 and 6.2.3 in the Final IFR has been revised to state consistently that the non-Federal sponsor is responsible, at 100 percent non-project cost, for addressing any contaminated groundwater encountered during construction activities, including its handling, treatment and disposal during dewatering.
19. Appendix K has been updated to indicate that the Los Angeles Department of Water and Power (LADWP) operates the wellhead treatment facility at Pollock, and to include a statement that because of the existence of this facility and its ongoing operation, the EPA considers the Pollock Well Field as an adequate remedy for addressing the HTRW groundwater contamination in this area of the SFVSS site and has concluded that further remedy is unnecessary. Appendix K has been further modified to address the comment regarding disposal and discharge requirements, including a statement that requirements for disposal and discharge of HTRW contaminated groundwater will also have to be identified and complied with prior to determining the final treatment technology for the contaminated water. In response to the comment that contaminant concentrations may still exceed drinking water and disposal and discharge standards, it is understood that concentrations of VOCs and chromium in this portion of the project area could still exceed drinking water standards and disposal or discharge standards.

*State Agencies and Representatives*

**Members of Assembly California Legislature, Gatto and Gomez**





**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

Assembly Member Mike Gatto  
43<sup>rd</sup> District, California  
300 East Magnolia Blvd., Suite 504  
Burbank, CA 91502

cc: Assembly Member Jimmy Gomez  
Assembly Member Richard Bloom  
Assembly Member Raul Bocanegra  
Assembly Member Ian Calderon  
Assembly Member Ed Chau  
Senator Lou Correa  
Assembly Member Roger Hernandez  
Assembly Member Chris Holden  
Senator Ted Lieu  
Senator Carol Liu  
Assembly Member Adrin Nazarian

Dear Honorable Members of the Assembly and Senate:

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles (“City” or “non-Federal sponsor”) for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the Recommended Plan.

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In this case, the NER Plan was Alternative 13, named the ARBOR Corridor Extension (ACE), in the Draft IFR. It was selected based on the required criteria used to assess and establish the selection of the NER Plan. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

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The Final IFR's Comments Appendix includes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

In general, in terms of scope and completeness of the recommended plan, while agency and stakeholder comments provided a large amount of technical input and analysis regarding the importance of Alternative 20, the Corps considers this input similar to what had previously been considered in reaching the agency's identification of Alternative 13 as the Tentatively Selected Plan (TSP).

In terms of connectivity benefits and the model used to calculate benefits, the Corps used a framework suggested by an Independent External Peer Review (IEPR) panel to better quantify the beneficial outputs of connectivity noted as being not fully captured in the public comments. By evaluating hydrologic, local, and regional connectivity and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array.

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and the next bigger best buy plan was over \$100 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits (after quantifying connectivity functions), there was not sufficient justification to select a larger scale plan as the NER Plan.

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The LPP would include additional restoration benefits above that identified for the NER plan at Verdugo Wash, widening of the natural riverbed for 1.5 miles in the Glendale Narrows (Reach 5), and expansion of restoration at and adjacent to the Los Angeles Trailer and Container Intermodal Facility (LATC) site. These additional restoration benefits include direct restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and provision of a direct connection to the significant ecological area of the Verdugo Mountains. Nearly unanimous support for Alternative 20 was expressed by the public through review of the Draft IFR and public meetings. The LPP is consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles. Implementation of the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

Over the last 150 years, the Los Angeles River has been degraded by development, flooding, and channelization, including the Corps' construction of the Los Angeles County Drainage Area flood risk management project that modified most of the Los Angeles River with concrete banks and a mostly concrete bed to protect the city and surrounding areas from catastrophic flooding. The Flood Control Acts of the 1930s and 1940s directed the Corps to construct the Los Angeles County Drainage Area project, which ultimately involved construction of 5 dams and approximately 500 miles of channels to protect communities from significant and recurring flood

damages. Restoration of 11 miles of the Los Angeles River, that was the focus of this IFR, is within the footprint of the existing flood risk management project. The ecosystem project would, in part, reverse a portion of the degradation associated with the existing Los Angeles County Drainage Area project, and concurrently advance a number of important Administration efforts, including the Climate Action Plan, America's Great Outdoors initiative, and the Urban Waters Federal Partnership. The Corps has factored in climate variability and future uncertainties, and with a more naturally functioning channel, there may be associated incidental benefits with respect to drought, such as increased percolation area and increased detention and retention characteristics. The America's Great Outdoors initiative would be advanced through provision of increased access to restored lands and urban waters. Lastly, the Los Angeles River is one of 7 original pilot locations for the Urban Waters Federal Partnership and the proposed restoration activities would advance the goals of restoring the ecosystem and balancing revitalization with flood avoidance to ensure public safety for 11 miles of 51 miles of the Los Angeles River.

Quantifications of the connections among restored areas demonstrate the significant benefits to be realized through implementation of Alternative 20 in lieu of the NER plan. Restoration of such connections will involve modifications to the urban river channel by removing concrete and reconfiguring channel walls and widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 would also provide significantly greater regional economic benefits, including over 11,000 more jobs and over \$3.8 billion in labor income, as well as substantive opportunities for redevelopment in both the Verdugo Wash confluence and Chinatown/Cornfields areas. Environmental justice benefits would also be realized through restored community cohesion for communities previously separated by the existing Los Angeles County Drainage Area flood risk management project through provision of new public access to restored natural areas with associated recreational amenities.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

CA State Senator Kevin de León



**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
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Kevin de León  
State Senator  
22<sup>nd</sup> District, California  
State Capitol, Room 510B  
Sacramento, CA 95814

Dear Senator de León:

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles (“City” or “non-Federal sponsor”) for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the four final alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the Recommended Plan.

We recognize that Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, it is recognized that Alternative 20, as the largest of the final array plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, from a Federal interest perspective, the primary focus of the project is ecosystem restoration, and the NER Plan must be identified in a restoration feasibility study. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or where the extra environmental value is just worth the costs.

Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. The NER plan determines Federal interest and forms the basis of cost-sharing for the recommended plan. In this case, the NER Plan in the Draft IFR was Alternative 13, named the ARBOR Corridor Extension (ACE). It was selected based on the required criteria used to assess and establish the selection of the NER Plan. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives, provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

During the public comment period for the Draft IFR, which closed on 18 November 2013, the Corps received and evaluated nearly 500 comments. Comments were received from Federal agencies including the U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (FWS), Department of Interior (DOI), and the Urban Waters Federal Partnership. Comments were also received and evaluated from State and local agencies, Non-Governmental Organizations (NGOs), other interest groups, elected officials, and private citizens.

- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
  - Scope of the recommended plan
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The Final IFR's Comments Appendix includes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

In general, in terms of scope and completeness of the recommended plan, while agency and stakeholder comments provided a large amount of technical input and analysis regarding the importance of Alternative 20, the Corps considers this input similar to what had previously been considered in reaching the agency's identification of Alternative 13 as the Tentatively Selected Plan (TSP).

In terms of connectivity benefits and the model used to calculate benefits, the Corps used a framework suggested by an Independent External Peer Review (IEPR) panel to better quantify the beneficial outputs of connectivity noted as being not fully captured in the public comments. By evaluating hydrologic, local, and regional connectivity and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array.

Although quantifying connectivity showed more restoration output for each of the alternatives as well as for differing combinations of key features, the increase in cost between Alternative 13 and the next bigger best buy plan was over \$100 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits (after quantifying connectivity functions), there was not sufficient justification to select a larger scale plan as the NER Plan.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on



Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

Alternative 13v provides the greatest amount of ecosystem restoration output for the investment cost; in other words, for the total project cost for Alternative 13v of \$694 million, there is no other plan of similar cost that produces more restoration output. Accordingly, Alternative 13v has been identified as the NER plan. Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan.

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The LPP would include additional restoration benefits above that identified for the NER plan at Verdugo Wash, widening of the natural riverbed in 1.5 miles of the Glendale Narrows (Reach 5), and expansion of restoration at and adjacent to the Los Angeles Trailer and Container Intermodal Facility (LATC) site. These additional restoration benefits include direct restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and provision of a direct connection to the significant ecological area of the Verdugo Mountains. Nearly unanimous support for Alternative 20 was expressed by the public through review of the Draft IFR and public meetings. The LPP is consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles. Implementation of the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

Over the last 150 years, the Los Angeles River has been degraded by development, flooding, and channelization, including the Corps' construction of the Los Angeles County Drainage Area flood risk management project that modified most of the Los Angeles River with concrete banks and a mostly concrete bed to protect the city and surrounding areas from catastrophic flooding. The Flood Control Acts of the 1930s and 1940s directed the Corps to construct the Los Angeles County Drainage Area project, which ultimately involved construction of 5 dams and approximately 500 miles of channels to protect communities from significant and recurring flood damages. Restoration of 11 miles of the Los Angeles River, that was the focus of this IFR, is within the footprint of the existing flood risk management project. The ecosystem project would, in part, reverse a portion of the degradation associated with the existing Los Angeles County Drainage Area project, and concurrently advance a number of important Administration efforts, including the Climate Action Plan, America's Great Outdoors initiative, and the Urban Waters

Federal Partnership. The Corps has factored in climate variability and future uncertainties, and with a more naturally functioning channel, there may be associated incidental benefits with respect to drought, such as increased percolation area and increased detention and retention characteristics. The America's Great Outdoors initiative would be advanced through provision of increased access to restored lands and urban waters. Lastly, the Los Angeles River is one of 7 original pilot locations for the Urban Waters Federal Partnership and the proposed restoration activities would advance the goals of restoring the ecosystem and balancing revitalization with flood avoidance to ensure public safety for 11 miles of 51 miles of the Los Angeles River.

Quantifications of the connections among restored areas demonstrate the significant benefits to be realized through implementation of Alternative 20 in lieu of the NER plan. Restoration of such connections will involve modifications to the urban river channel by removing concrete and reconfiguring channel walls and widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 would also provide significantly greater regional economic benefits, including over 11,000 more jobs and over \$3.8 billion in labor income, as well as substantive opportunities for redevelopment in both the Verdugo Wash confluence and Chinatown/Cornfields areas. Environmental justice benefits would also be realized through restored community cohesion for communities previously separated by the existing Los Angeles County Drainage Area flood risk management project through provision of new public access to restored natural areas with associated recreational amenities.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

**CA State Senator Fran Pavley**



**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

The Honorable Fran Pavley  
State Senator  
27<sup>th</sup> District, California  
5016 North Parkway Calabasas, Suite 222  
Calabasas, CA 91302

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Acting Chief, Planning Division  
USACE, Los Angeles District

Assembly Member Richard Bloom





**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

Richard Bloom  
Assembly Member  
50<sup>th</sup> District, California  
2800 28<sup>th</sup> Street, Suite 150  
Santa Monica, CA 90405

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2. The IFR evaluates the other social effects (OSE), as you mentioned "recreational opportunity for everyone" or environmental justice associated with project alternatives. It is recognized that the study area includes lower income and minority populations, and the area has a strong need for additional parks and recreation opportunities, in particular neighborhood parks. The NER Plan (Alternative 13v) would provide significant benefits to the local population, as outlined in the OSE analysis. The OSE benefits are even more substantial for Alternative 20, the Recommended Plan, and would greatly benefit the local population. The project would include a recreation plan, which does not detract from ecosystem outputs while enhancing recreation opportunities in a restored ecosystem setting. This recreation plan would also provide significant benefits to the local population.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

**CA Dept of Fish and Wildlife, Scott P. Harris**

1. The City of Los Angeles will coordinate with CDFW on a Streambed Alteration Agreement.
2. The IFR will be updated to include discussion of potential impacts to waters of the state and the difference between WOTS and WOUS.
3. The algae and herbaceous foraging habitat in the concrete lined bed may be disturbed during construction, depending on the location, but ultimately any concrete lined areas that are not restored to natural habitat would be maintained as they currently are. Sediment, algae, and herbaceous foraging habitat are expected to re-establish in these areas after construction is complete. It is expected that any concrete in the channel that is removed (as in Alternatives 16 and 20) would be replaced by natural geomorphology and riparian/wetland habitat that would be a habitat improvement over the current concrete lined bed, including for shorebirds.

**CA Dept of Parks and Recreation**

1. The Corps recognizes the many benefits that are associated with selection of Alternative 20. (See GR-A). The Corps also recognizes the statewide and national significance of the Los Angeles River as stated in your comment letter. The Corps further recognizes that the river corridor includes environmental justice communities. Thank you for the information on the National Park Service Rim of the Valley Corridor Special Resource Study. The study information was discussed in Section 2.1.2. The Corps appreciates the willingness of your agency to provide lands at the Bowtie and Cornfields sites for the restoration project. Since receiving your comments, we have engaged with you to further coordinate on the consistency of the plans for Cornfields and the Bowtie parcel, and to address the interests in land necessary for the restoration project. We will continue to coordinate with you on this effort.
2. We appreciate your comments on the biological resources found in the study area and the potential for restoration. Sensitive plant and wildlife species as well as their potential for occurrence in various habitat types within the Study Area are included in Appendix H. In compliance with CEQA, special status species were considered in the preparation of Appendix H in the following manner: In preparing the biological resources section of the EIS/EIR/IFR, we reviewed information from several sources, including the CNDDDB for the USGS quads that cover the ARBOR Reach and tributaries, the USFWS and CDFW species list for the Los Angeles County area, and the California Native Plant Society list (focusing primarily on 1A and 1B plant species from the CNPS list). Once the list was narrowed to those species that could potentially be found in habitats that occur in riparian areas in southern CA waterways, the list was further refined based on habitats that were identified in the CHAP appendix. Sensitive species that were determined to be likely to occur in the study area were discussed in Sections 3.5.4 and 5.5.4 of the Draft (and Final) IFR. All other species with the potential to occur in historically-occurring habitats were listed in the tables in the Appendix H. The comment letter specifically mentioned *A. pulchra pulchra*. This species requires loose soils in chaparral or pine-oak woodlands, a habitat type that may well occur in the watershed but not in the study reach. This species was identified as being “Not Likely to Occur” and has been added to the appendix.

Impacts to vegetation and wildlife species during construction and operation and maintenance activities are generally described in Section 5.5.3. Minimization measures are included in Section 5.5.4. Impacts or benefits to each individual species with potential to occur are not specified, as impacts are considered to be similar across various groups of species that are found within riparian and/or wetland ecosystems as described in Section 5.5.3.

3. Concur. These BMPs are included in the Final IFR in Section 5.5.4.
4. See GR-B.
5. Thank you for your comment. The Corps appreciates and acknowledges the more historic references to the property. However, for practical purposes and due to its frequent use to this point, its reference as “Cornfields” in the report will remain the same, but the alternative names will be included in the report at first usage.
6. The Corps agrees that additional study is needed consistent with the NHPA Section 106 process. During subsequent planning stages for project construction, but prior to the issuance of a notice to proceed for construction, a records and literature search, and intensive field survey and inventory, will be conducted. In addition, a National Register of Historic Places (NRHP) evaluation will be conducted of all identified resources. The California State Parks would be invited to review and comment on all studies. If properties listed in, or eligible for listing in the NRHP, would be affected by the Recommended Plan, comments of the SHPO, Tribal organizations and individuals, California State Parks, the ACHP, and other interested parties shall be sought pursuant to NHPA Section 106 and its implementing regulations. Comments shall also be sought in the event that for the recommended plan, there will be "no effect" on historic properties. If the project will result in an adverse effect, the Corps shall ensure that a historic property treatment plan (HPTP) is prepared, executed and fieldwork completed prior to the initiation of any activities that have the potential to effect historic properties. The HPTP will be prepared in consultation and coordination with the consulting parties. The California State Parks has been invited to consult on the undertaking and on the Draft Programmatic Agreement (PA) for historic properties, has been afforded consulting party status pursuant to 36 CFR 800.3(f)(1), and has been invited to be a concurring party to the PA to address the remainder of the NHPA Section 106 process. The PA is located in Appendix O Cultural Resources.
7. Concur with this concern. These additional studies including geomorphic studies and analysis of ethnographic village locations and archaeological deposits for the project would be undertaken during the design phase of the project.
8. The Corps appreciates the opportunity to review and utilize this additional information in our identification efforts.
9. The Corps has invited the California State Parks to be a concurring party to the PA.

### **CA State Clearinghouse**

Thank you for your letter. Your comments are noted.

### **CA Water Boards, LA Regional Water Quality Control Board**

1. Thank you for your comments on the IFR. We appreciate your statement that the project alternatives are consistent with the Greater Los Angeles County Integrated Regional Water Management Plan and with those of the State's Recycled Water Policy. This project is proposed as part of the Corps' mission to restore habitat values in aquatic and riparian ecosystems. Storm water and water quality improvements are not objectives of the study as they are the responsibility of other parties; water quality improvements are incidental benefits.
2. Comment noted. However in this instance, the term stormwater runoff is not referring to the legal definition of stormwater discharges (outfalls). Under NPDES permitting, the term discharge is specifically referring to pollutants generated and discharged from watershed point sources: construction, municipal, and industrial. The intent of the text was to demonstrate the diffuse sources of pollutants that rainwater collects as it moves surficially through the watershed.

To prevent confusion, instances in the text where non-point sources and stormwater runoff are used in the same sentence will be re-written to clarify that stormwater discharges are point sources.

3. The IFR is updated in accordance with the factual information that was provided pertaining to the water quality section. Comments on water quality improvements are noted. Water quality benefits are incidental to the restoration.
4. See response 2 above, Section 3.12.4- Stormwater will be edited in the final IFR to incorporate clarification that addresses the comment.
5. Comment noted. The Final IFR will be updated with the new Order Number.
6. Concur. Language pertaining to the MS4 Permit will be added.
7. The edits recommended to the text on Page 5-48 will be incorporated. Remediation of water quality and quantity issues is not an objective of the restoration study. However, water quality improvement may be an incidental benefit.
8. Comment noted. The Final IFR will include language to further clarify the SWPPP requirement and 401 certification consistent with the comment.
9. The BMPs included in the Draft IFR reflect protection of bird nesting activities (Section 5.5.4). Construction BMPs are established to protect water quality (5.4.4) and biological resources (5.5.4). All federal and state regulations regarding construction will be followed.
10. NPDES permit requirements are noted in Section 5.4 of the IFR, consistent with your comment.
11. This is an important issue throughout the Los Angeles Watershed; however, the issues of recycled water, increased capture, and use of stormwater are outside of the scope of Corps ecosystem restoration, except as they may affect the available water budget. The City is responsible for providing water necessary to support the restoration features. It is the City's desire to use recycled water, when feasible, for construction and maintenance of the completed project to support habitat. The recommended sentence will be added to Page 5-41, Line 31.
12. The IFR addresses potential improvements to water quality for communities in the study area. See section 5.13.3: "Any improvements in environmental quality (such as water quality) in the region as a result of a cleaner, active River system would benefit all populations in the study area" was included as an operational effect for Alternative 10 and referenced for the remaining alternatives.
13. The benefit of increased infiltration was not evaluated quantitatively at this level of design and study. The Final IFR includes recognition in Section 5.4.3 that there may be incidental water quality benefits from implementation.
14. References and citations will be revised consistent with the comment.

### **South Coast Air Quality Management District**

1. The list of equipment presented in Appendix F has been updated. The equipment list corresponds with data entered into CalEEMod.
2. Comment noted. We are aware of Rule 403 requirements for large operations and will consult with SCAQMD staff regarding permits and forms.
3. Proposed BMP's will be incorporated in the Final IFR as appropriate, as addressed below.
4. Revised emissions estimates indicate that for all alternatives emissions would not exceed Regional Significance Thresholds. However, for Alternatives 10, 13, 16, and 20 there would be limited exceedances of Local Significance Thresholds. Tier 4 equipment would be utilized to the



extent practicable during construction years when emissions are expected to exceed Local Significance Thresholds.

5. Revised emissions estimates indicate that for all alternatives emissions would not exceed Regional Significance Thresholds. However, for Alternatives 10, 13, 16, and 20 there would be limited exceedances of Local Significance Thresholds. During construction years when emissions are expected to exceed Local Significance Thresholds, model year 2010 and newer diesel haul trucks would be utilized to the extent practicable.
6. Operating permits will be provided as required at the time of construction.
7. We can let contractors know about the availability of SCAQMD “SOON” program funds.
8. The air quality chapter has been updated to reflect the correct General Conformity Thresholds. In addition, the Corps coordinated with SCAQMD General Conformity compliance. Discussions of NEPA and General Conformity thresholds are discussed in the revised air quality chapter and the Record of Non-Applicability in Appendix F.
9. The availability of rail transport through Taylor Yard during construction is unknown since restoration activities would also extend into Taylor Yard. The recommendation would be further evaluated during the engineering and design phase subsequent to the completion of the draft EIR/EIS.

### ***County Agencies***

#### **County of LA Dept of Parks and Recreation**

Noted. Coordination with the department’s trails section on the referenced trail will occur prior to development of detailed plans and specifications. The proposed trail should be consistent with our recreation plan.

#### **County of LA Dept of Public Works**

1. Thank you for your comments. The City of Los Angeles is in the process of requesting a LOMR (letter of map revision) to FEMA that would identify the flood risks and flood zones along the Los Angeles River. We are working with the City on that effort. That effort is anticipated to be complete before any construction begins on the ecosystem restoration project. This ecosystem restoration study does not preclude any future flood risk management studies.
2. One of the major constraints for the ecosystem restoration study is there would be no adverse impacts to the current flood risks along the river. To accomplish this, we have identified the design water surface and water velocity as the two factors for determining the impacts. An increase in water surface would be an unacceptable result for any of the project features. Thus the proposals result in no increase in water surface elevation and there would be no adverse impacts on the interior drainage system, see Appendix E for a discussion of water surface elevations.

#### **County of LA Dept of Regional Planning**

1. Thank you for your comments and the information provided on the County’s Significant Ecological Area Program (SEA). SEA information will be added to section 3.5.6 as appropriate.
2. See GR-A.

**City of LA Councilmember Tom LaBonge**



**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

The Honorable Tom LaBonge  
Councilmember  
District 4, City of Los Angeles  
200 N. Spring St. Room 480  
Los Angeles, CA 90012

Dear Councilmember LaBonge:

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles (“City” or “non-Federal sponsor”) for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the four final alternatives carried forward for further analysis and consideration in the Draft IFR, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the Recommended Plan.

We recognize that Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, it is recognized that Alternative 20, as the largest of the final array plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, from a Federal interest perspective, the primary focus of the project is ecosystem restoration, and the NER Plan must be identified in a restoration feasibility study. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or where the extra environmental value is just worth the costs.

Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. The NER plan determines Federal interest and forms the basis of cost-sharing for the recommended plan. In this case, the NER Plan identified in the Draft IFR was Alternative 13, named the ARBOR Corridor Extension (ACE). It was selected based on the required criteria used to assess and establish the selection of the NER Plan. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

During the public comment period for the Draft IFR, which closed on 18 November 2013, the Corps received and evaluated nearly 500 comments. Comments were received from Federal agencies including the U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (FWS), Department of Interior (DOI), and the Urban Waters Federal Partnership. Comments were also received and evaluated from State and local agencies, Non-Governmental Organizations (NGOs), other interest groups, elected officials, and private citizens.

- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
  - Scope of the recommended plan
  - Support for Administration's Urban Waters Federal Partnership initiative
  - Compliance with WRDA 2007 requirements to reflect the City's LA River Revitalization Master Plan
  - Acceptability to sponsor and stakeholders
  - Connectivity benefits associated with individual plans
  - Habitat Model used to calculate benefits (CHAP)
  - Environmental justice
  - Inclusion of Union Pacific Rail Road Yard (LATC) site
  - Global scarcity of subject habitat type(s)

The Final IFR's Comments Appendix includes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

In general, in terms of scope and completeness of the recommended plan, while agency and stakeholder comments provided a large amount of technical input and analysis regarding the importance of Alternative 20, the Corps considers this input similar to what had previously been considered in reaching the agency's identification of Alternative 13 as the Tentatively Selected Plan (TSP) in the Draft IFR.

In terms of connectivity benefits and the model used to calculate benefits, the Corps used a framework suggested by an Independent External Peer Review (IEPR) panel to better quantify the beneficial outputs of connectivity noted as being not fully captured in the public comments. By evaluating hydrologic, local, and regional connectivity and combining the resultant output with the initial habitat model output, the Corps was able to more comprehensively compare the alternatives in the final array.

Although quantifying connectivity showed more restoration output for each of the alternatives as well as for differing combinations of key features, the increase in cost between Alternative 13 and the next bigger best buy plan was over \$100 million. Given the magnitude of the incremental costs relative to the incremental increase in benefits (after quantifying connectivity functions), there was not sufficient justification to select a larger scale plan as the NER Plan.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in the IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the

Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

Alternative 13v provides the greatest amount of ecosystem restoration output for the investment cost; in other words, for the total project cost for Alternative 13v of \$694 million, there is no other plan of similar cost that produces more restoration output. Accordingly, Alternative 13v has been identified as the NER plan. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan.

In a letter dated April 10, 2014, the City of Los Angeles requested selection of Alternative 20 as the Recommended Plan at a cost-share scenario different from traditional Corps policy. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memo dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exception and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report. The rationale for granting that request is described below.

The LPP would include additional restoration benefits above that identified for the NER plan at Verdugo Wash, widening of the natural riverbed for 1.5 miles in the Glendale Narrows (Reach 5), and restoration at the Los Angeles Trailer and Container Intermodal Facility (LATC) site. These additional restoration benefits include direct restoration of an additional 121 acres, nearly twice the acreage of local and hydrologic connectivity (298 acres total), and provision of a direct connection to the significant ecological area of the Verdugo Mountains. Nearly unanimous support for Alternative 20 was expressed by the public through review of the Draft IFR and public meetings. The LPP is consistent with the goals of the Los Angeles River Revitalization Master Plan published in 2007 by the City of Los Angeles. Implementation of the LPP appears to best address the public's expressed desire for increased habitat and hydrologic connectivity, regional economic development and recreation, and restored community cohesion.

Over the last 150 years, the Los Angeles River has been degraded by development, flooding, and channelization, including the Corps' construction of the Los Angeles County Drainage Area flood risk management project that modified most of the Los Angeles River with concrete banks and a mostly concrete bed to protect the city and surrounding areas from catastrophic flooding. The Flood Control Acts of the 1930s and 1940s directed the Corps to construct the Los Angeles County Drainage Area project, which ultimately involved construction of 5 dams and over 240 miles of channels to protect communities from significant and recurring flood damages. Restoration of 11 miles of the Los Angeles River, that was the focus of this IFR, is within the footprint of the existing flood risk management project. The ecosystem project would, in part, reverse a portion of the degradation associated with the existing Los Angeles County Drainage Area project, and concurrently advance a number of important Administration efforts, including the Climate Action Plan, America's Great Outdoors initiative, and the Urban Waters Federal Partnership. The Corps has factored in climate variability and future uncertainties, and with a more naturally functioning channel, there may be associated incidental benefits with respect to drought, such as increased percolation area and increased detention and retention characteristics. The America's Great Outdoors initiative would be advanced through provision of increased

access to restored lands and urban waters. Lastly, the Los Angeles River is one of 7 original pilot locations for the Urban Waters Federal Partnership and the proposed restoration activities would advance the goals of restoring the ecosystem and balancing revitalization with flood avoidance to ensure public safety for 11 miles of 51 miles of the Los Angeles River.

Quantifications of the connections among restored areas demonstrate the significant benefits to be realized through implementation of Alternative 20 in lieu of the NER plan. Restoration of such connections will involve modifications to the urban river channel by removing concrete and reconfiguring channel walls and widening the channel to restore hydrologic connectivity and additional wetland habitat. Alternative 20 would also provide significantly greater regional economic benefits, including over 11,000 more jobs and over \$3.8 billion in labor income, as well as substantive opportunities for redevelopment in both the Verdugo Wash confluence and LA State Historic Park (Chinatown/Cornfields areas). Environmental justice benefits would also be realized through restored community cohesion for communities previously separated by the existing Los Angeles County Drainage Area flood risk management project through provision of new public access to restored natural areas with associated recreational amenities.

The Recommended Plan includes a recreation plan formulated to be consistent with the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

**City of LA Councilmember Mitch O’Farrell**



**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**  
**915 WILSHIRE BOULEVARD, SUITE 930**  
**LOS ANGELES, CALIFORNIA 90017**

The Honorable Mitch O'Farrell  
Councilmember  
District 13, City of Los Angeles  
200 N. Spring St. Room 450  
Los Angeles, CA 90012

Dear Councilmember O'Farrell:

Thank you for your comments on the Draft Integrated Feasibility Report (IFR) prepared by the U.S. Army Corps of Engineers (Corps) and City of Los Angeles ("City" or "non-Federal sponsor") for the Los Angeles River Ecosystem Restoration Feasibility Study. Alternative 20 was one of the four final alternatives carried forward for further analysis and consideration, because it is an efficient plan which provides greater habitat restoration output than smaller scale plans and includes additional connections to regional habitat areas in important areas. Although this alternative was not identified as the National Ecosystem Restoration (NER) plan, this alternative has been identified as the Locally Preferred Plan (LPP) and will be the Recommended Plan.

1. We recognize that Alternative 20 provides the greatest habitat restoration output of the final array plans. Further, it is recognized that Alternative 20, as the largest of the final array plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. However, from a Federal interest perspective, the primary focus of the project is ecosystem restoration, and the NER Plan must be identified in a restoration feasibility study. Corps planning guidance describes the NER Plan as the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and non-monetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or where the extra environmental value is just worth the costs.

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- The Corps reviewed all the feedback by subject area, and carefully designated key categories of input:
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  - Habitat Model used to calculate benefits (CHAP)
  - Environmental justice
  - Inclusion of Union Pacific Rail Road Yard (LATC) site
  - Global scarcity of subject habitat type(s)

The Final IFR's Comments Appendix includes all public comments along with Lead Agencies' responses that address pertinent issues identified in the comments.

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Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

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2. Your comments on lack of recreation and natural space for many neighborhoods in the project area are noted. Recreation and open space are discussed in Sections 3.9, 3.13.3, and 5.9 of the Final IFR.

If you have any further questions, please contact me at (213) 452-3783.

Sincerely,

Eduardo T. De Mesa  
Acting Chief, Planning Division  
USACE, Los Angeles District

**City of LA Bicycle Advisory Committee**

See GR-A.

**City of LA Bureau of Sanitation**

1. See GR-A.
2. It is noted that the LA Bureau of Sanitation supports Alternative 20 and that as part of a collaboration under Proposition O, LA Sanitation is committed to improving water quality.

**City of LA Dept of City Planning**

1. See GR-A.
2. The description of the Vision Plan and Economic Development Strategy for the Northeast Los Angeles River District has been added to Section 3.3.3. The RIO overlay was described in Section 3.3.3 of the IFR.

**City of LA Dept of Recreation and Parks**

1. Thank you for your comments. Recreation impacts have been addressed in Section 5.9 of the EIS. The Corps will continue to coordinate with the City's Recreation & Parks Dept. during the pre-construction engineering and design phase to address any potential issues such as those described in your comment.
2. The recommended edits to table references will be made.

**City of LA Economic and Workforce Development Dept**

1. See GR-A.
2. We have included information about the Partnership for Sustainable Communities program in Section 3.3.3 of the IFR.

**Los Angeles Dept of Water and Power**

1. See GR-A.
2. Recycled water and increasing constraints on its availability is a significant factor in the water budget. The non-Federal sponsor understands its responsibility for ensuring the necessary supply to support ecosystem restoration features. The goal is to utilize native plants that can persist without supplemental irrigation. The plant palette will adapt to the amount of water available.
3. As part of this study, we will produce an Adaptive Management Plan. This plan will include adjustments that may need to be made based on fluctuating water supplies to ensure success of the restoration proposals. Flow rates along the river will be reviewed and updated as needed. We welcome any support from and continued coordination with LADWP.
4. Noted. Some of the restoration alternatives will require relocation of water and/or power lines as part of the non-Federal sponsor's provision of all necessary lands, easements, rights of way, relocations and disposal sites. These impacts are discussed in Sections 5.12 and Chapter 7 of the IFR. We will work with all the proper agencies to ensure any effects on water and/or power infrastructure will be addressed appropriately.
5. Thank you for your comments.

**Los Angeles Unified School District, Bennett Kayser, Board Member**

1. See GR-A.

2. Comment noted. Educational value is a benefit that will result from any of the alternatives, including the NER plan and the Recommended Plan.

**Los Angeles Unified School District, Office of Environmental Health and Safety**

See GR-A.

***Other Cities***

**City of Burbank Community Development Dept**

1. The IFR has been updated to reflect the newly completed Burbank 2035 General Plan.

Existing conditions from attached sources will be reviewed and incorporated into the document as needed.

2. The existing Class II (bike lane) bikeway on Riverside Drive and the existing Class III (bike route) bikeway on Keystone Street are in relatively close proximity to the features in the recreation plan. While connection to the existing Burbank facilities is outside the scope of the LA River Ecosystem Restoration project, there may be opportunities for improvements which the City of Burbank and City of Los Angeles might investigate as feasible.

3. Regarding the project traffic analysis, the Lead Agencies have determined that the anticipated volume of project trips does not trigger the need to do a comprehensive traffic study. The project team reviewed the recreation study that was created as part of the Economics Appendix (Appendix B of the IFR) to identify any locations that may present a point-source draw for recreationalists. Recreation numbers were reviewed and compared to figures showing access points, point draws, and new or refurbished trails. None of the project features are within the city limits of Burbank, and the only part of the project area in proximity to Burbank that could reasonably contribute to traffic is Pollywog Park. Two access points would be available for users of the improved trail in Pollywog Park and existing trails on the north side of the river, near Griffith Park. Almost 0.5 mile of upgraded trail would occur in Pollywog Park, which is located outside of the Burbank city limits. Access points to the trails are located near the Burbank city limits, and while parking needs in their vicinity may increase, there is street parking located along the park perimeter in the following locations: at Pollywog Park along Reese Road and Valleyhart; at Buena Vista Park along Riverside Drive and Bob Hope Drive; and at the Betty Davis Picnic Area along Rancho Avenue and Riverside Drive and Riverside Drive and Western. It appears that local neighborhood residents currently utilize the unmaintained dirt trails throughout this area and presumably do so by foot rather than vehicle. Figure 7-8 of the IFR, and associated figures in Appendix B, Attachment 1 (Recreation Analysis) display the location of trails and access points. Trail usage data was not available, and therefore, projections were developed through the application of the "Recreation Park and Open Space Standards and Guidelines," by the National Recreation and Parks Association (NRPA 1983). It cites a standard for urban trail use at maximum of 90 users per day per mile of trail (weekends). Section 2.1 of the Recreation Analysis, which is part of Appendix B of the IFR, describes the methodology in more detail. At a maximum estimated amount of 65 users per mile on summer weekdays under proposed conditions, it is estimated that the upgraded trail would draw a maximum of 33 users per day, some of whom would access the trail from points upstream and downstream of Pollywog Park and would, therefore, not be parking at the access points. Even if all trail users drove to the access points within the Burbank city limits, the increase in traffic would still be far below the level for required traffic analysis or significant impacts specified by the City of

Burbank's CEQA traffic significance thresholds. Specifically, the significance threshold for local street impacts is 500 or more daily trips, and at most only 33 daily users are expected in this area. Daily usage numbers are derived from the methodology described above and in multiplying 0.5 miles of improved trail by a maximum of 65 users per mile on weekdays. Therefore, applying the City of Burbank's CEQA traffic thresholds does not alter the conclusion that impacts to traffic would be less than significant.

4. Concur. Language has been added in Section 5.8.3 to indicate that weekday construction will occur between 8:00AM – 6:00 PM, Saturdays from 8:00-5:00, and not at all on Sundays or holidays.

5. The potential staging areas identified in the IFR will be further coordinated during the Preconstruction, Engineering, and Design (PED) and Construction Phases of the project. These areas are proposed for restoration, some of the only open space in the area, and are in non-Federal sponsor ownership, and therefore, provide reasonable staging areas for the project. Additional coordination of staging will be conducted in PED.

6. Specific coordination will occur during PED and Construction. Necessary approvals will be obtained prior to construction. The Corps and the City of Los Angeles will closely coordinate implementation details with neighboring municipalities and community stakeholders.

7. While Alternative 13 was the tentatively selected plan in the Draft IFR and 13v is the NER plan, Alternative 20 is the Recommended Plan. Alternative 20 is one of the alternatives considered in the final array of alternatives in the Draft IFR and in this Final IFR. No recirculation or supplemental IFR is required, as Alternative 20 was addressed in the Draft IFR; however, there is an opportunity for additional agency and public comment on the Final IFR during its 30-day circulation period.

### **City of Glendale**

See GR-A.

### **City of Lakewood**

Thank you for your comment. One of the major constraints for this study was there would be no adverse impacts to the current flood risk management along the Los Angeles River. As such, any modifications to the channel will entail detailed engineering analyses to ensure the project will not adversely impact channel capacity or structural stability of the existing channel. The recommended plan will not increase flood risks or residual flood risks for all reaches of the Los Angeles River, including the Los Angeles River in the vicinity of Lakewood.

### ***Organizations & Businesses***

#### **AIA Los Angeles**

See GR-A.

#### **Alliance of River Communities**

See GR-A.

**Alternative Apparel**

See GR-A.

**Arid Lands Institute**

See GR-A.

**Arroyo Seco Foundation**

See GR-A and GR-B.

**Arthur Golding & Associates**

1. We agree incorporating flood risk management as an objective could be beneficial, but flood risk management is not within the scope of the current Ecosystem Restoration Feasibility Study as agreed upon with the non-Federal sponsor. The non-Federal sponsor does not have jurisdiction for flood risk management, which is performed by the Corps and the Los Angeles County Department of Public Works. The current study does not preclude additional flood risk management study in the future.
2. The Corps recognizes the flood risks along this portion of the Los Angeles River and we could partner with an appropriate agency to address flood protection measures in future studies. As we move into the detailed design phase of the current study, we will incorporate designs favorable to ecosystem restoration, which may also have an incidental flood risk benefit.
3. The Corps agrees that there are many opportunities for restoration and additional flood risk management, however, not all of these opportunities can be realized by the Corps alone. It is expected that many entities will collaborate to respond to restoration needs along the river.
4. See GR-B.
5. Comment noted. The proposed project is designed to be consistent with general plans for each city in the ARBOR reach, as well as the specific plans for each community that touches the study area. Not all of the recommendations in those plans can be completed through this project.
6. The Corps understands that local plans outline continuous greenways, however not all of these greenways can be realized by the Corps alone. It is expected that many entities will collaborate to respond to restoration needs along the river. The plant palettes will be coordinated further with local experts on LA River flora in the project area vicinity and may be updated as necessary to ensure the most appropriate mix of locally native species is used in each area.
7. See GR-A.

**Arup**

See GR-A.

**Audubon Center at Debs Park**

1. See GR-A.
2. We are aware of the IBA downstream of the study reach. Water flows would not be altered as a result of implementing restoration in the ARBOR reach. Therefore the proposed project should have no effect on the suitability of downstream areas to support shorebird use. However, it should be noted that water flows within the channel are not controlled by the restoration project.

**Big Brand Water Filter, Inc**

The primary purpose of the alternatives considered in the IFR is to restore approximately 11 miles of the Los Angeles River from Griffith Park to Downtown Los Angeles by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries, its historic floodplain, and the regional habitat zones of the Santa Monica, San Gabriel, and Verdugo mountain ranges while maintaining existing levels of flood risk management. A secondary purpose is to provide recreational opportunities consistent with the restored ecosystem. Water quality improvement is considered an ancillary problem/opportunity and is not an objective of the Study. It was considered as an objective initially, because of public concerns about the River's poor water quality, but was not carried forward for several reasons. While water quality improvement objectives would be focused on improvement for aquatic organisms and restoration purposes (not human use or consumption), the existing riparian and freshwater marsh habitats and the associated wildlife have been sustained and are viable under the current water quality conditions. Water inputs to the River from the upstream Tillman Water Reclamation Plant are regulated and monitored by State water agencies and storm water inputs to the river are being improved through local regulations. Furthermore, certain measures currently evaluated in the study will incidentally improve water quality through natural processes such as 1) increased acreage of riparian and freshwater marsh, 2) daylighting storm drains and planting wetlands at their confluences, 3) creating side channels that remove water from the River, direct it through created wetland and riparian areas, and return this naturally treated water to the River. The LA River Ecosystem Restoration Study will not attempt to address State total maximum daily loads (TMDLs) standards, and assumes that those entities identified as responsible parties will comply with State requirements prior to construction of any proposed project. Despite the presence of contaminants and TSS, many fish and wildlife species have continued to persist and utilize the aquatic resources provided by the river. Incidental improvements to water quality through the restoration project, while not a stand-alone objective, will improve conditions for these species and others that will be attracted to the expanded habitat area. The proposed project will include direct removal of trash within the study area, as well as establishment of marsh and riparian vegetation that will promote natural processes of physical and biological remediation. With respect to soil and water contamination subject to CERCLA, the City of Los Angeles is responsible at 100% non-project cost for addressing lands contamination prior to project construction and responsible at 100% non-project cost for addressing groundwater contamination encountered during construction, including during dewatering activities.

**CA Native Plant Society, Los Angeles/Santa Monica Mountains Chapter**

See GR-A.

**Central City Association**

See GR-A.

**Chatten-Brown & Carstens**

See GR-A.

**Chinese American Citizens Alliance, Los Angeles Lodge**

See GR-A.



## **Community Conservation Solutions**

See GR-A.

## **Council for Watershed Health**

1. See GR-A.
2. Thank you for the information confirming the study's analysis with respect to river areas and confluences.
3. While we recognize that water quality improvements may occur as a result of ecosystem restoration, this is not a specific objective of the study and such benefits are considered incidental.
4. An Adaptive Habitat Management Plan has been developed for the Final IFR that outlines an invasives management program within the project area. The Corps will be responsible for invasives management until success criteria are met (typically within 5 years), and the City of Los Angeles as the non-Federal sponsor will be responsible thereafter for the life of the project. Management of invasives outside of the project area would be the responsibility of other entities interested in funding and maintaining such an effort in those areas.
5. The plant palettes will be coordinated further with local experts on LA River flora in the project area vicinity and may be updated as necessary to ensure the most appropriate mix of locally native species is used in each area.
6. The Corps has met with representatives from the Council for Watershed Health to discuss use of local seed sources for restoration. Since construction is not expected to begin for many years, the Corps will continue to collaborate to support use of local seed for propagation of restoration plant material wherever possible.
7. The Corps has participated in the Coalition to discuss the proposed plant palettes and use of local plant material. The Corps will continue to collaborate to improve restoration implementation and receive guidance from local experts.
8. It is recognized that Alternative 20, as the largest of the final array plans, would generate the greatest benefits to the regional economy (RED Account). However, the primary focus of the project is ecosystem restoration. The Corps typically recommends the plan that is the National Ecosystem Restoration (NER) Plan. Engineering Regulation 1105-2-100 specifies (p. E-7), that: "For ecosystem restoration projects, a plan that reasonably maximizes ecosystem restoration benefits compared to costs, consistent with the Federal objective, shall be selected. The selected plan must be shown to be cost effective and justified to achieve the desired level of output. This plan shall be identified as the National Ecosystem Restoration (NER) Plan."

In this case, the NER Plan in the Draft IFR was Alternative 13 because it was the alternative that met study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array. When selecting a plan to propose for authorization, the Corps must consider not only benefits but the reasonableness of costs to achieve those benefits in comparing alternatives (ER 1105-2-100, p. E-164). The cost of Alternative 20 is over \$600 million greater than the cost for Alternative 13. Therefore, Alternative 13 was identified as the NER Plan.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on

Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. This variation has been identified as the NER plan in the Final IFR on the basis of the analysis referenced above.

However, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

9. It is recognized that Alternative 20, as the largest of the final array plans, would generate the greatest benefits to the Other Social Effects (OSE) account. As noted in the comment, these benefits are more difficult to quantify than other categories of benefits, but the larger scale of Alternative 20 does afford the opportunity for greater OSE benefits as outlined in the IFR. As noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan (including RED and OSE).

10. It is true that Alternative 20 is both a cost effective and Best Buy plan, which is why it was one of the four plans carried forward in the Final Array. As the comment notes, while Alternative 20 is a Best Buy Plan, it does provide diminishing returns, i.e., the incremental costs per output for this plan are substantially higher than for Alternative 13v. Hence, this plan is less efficient than Alternative 13v and was a primary reason why Alternative 13v is confirmed as the NER Plan. However, for the reasons cited above, the Corps is recommending Alternative 20 as the Locally Preferred Plan.

11. While Turf Reinforcement Mats (TRMs) are currently considered for erosion control, design decisions will be made during the detailed design phase prior to construction. The Corps will continue to evaluate options for erosion control to minimize impacts to wildlife.

### **Downtown Los Angeles Neighborhood Council**

1. The Draft IFR document and technical appendices were made available for public coordination per NEPA regulations, including proper public notification and the required 30 day review period. Additionally, the public review period was extended due to the temporary government shutdown.

2. Thank you for your close attention to the IFR and for your comments. The alternatives included in the IFR address the 11-mile study reach for the reasons described in sections 1.1.2 and 1.2.1 [Please note that Alternative 13 does include proposed restoration at the Los Angeles Trailer and Container (LATC) rail facility, also known as the “Piggyback Yard.” This is a 100+ acre site on the east bank of the river in the community of Boyle Heights, adjacent to Lincoln Heights located just upstream of Cesar Chavez Avenue—the last major restoration area proposed in the study area, which ends just downstream near 1st Street.] You are correct that Alternative 20 would offer more restoration in the Downtown LA area than Alternative 13 would, because it would include a habitat connection between the LATC site and the river and upstream

connections to the LA State Historic Park site. The 6<sup>th</sup> Street Bridge is a separate –project being undertaken by the City of Los Angeles, which will have Corps review as part of the Section 408 permit process.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. This variation has been identified as the NER plan in the Final IFR on the basis of the analysis referenced above.

3. The social benefits of a more comprehensive alternative plan are not captured in the ecological analyses but are addressed by other Corps analysis included in the report. They are considered in the analyses of regional economic development (RED) and Other Social Effects (OSE) section of the IFR, per the US Army Corps of Engineers planning guidelines.

It is recognized that Alternative 20, as the largest of the final array of plans, would generate the greatest benefits to the regional economy (RED Account). However, the primary focus of the project is ecosystem restoration. The Corps typically recommends the plan that is the National Ecosystem Restoration (NER) Plan. Engineering Regulation 1105-2-100 specifies (p. E-7), that: “For ecosystem restoration projects, a plan that reasonably maximizes ecosystem restoration benefits compared to costs, consistent with the Federal objective, shall be selected. The selected plan must be shown to be cost effective and justified to achieve the desired level of output. This plan shall be identified as the National Ecosystem Restoration (NER) Plan.”

In this case, the NER Plan is Alternative 13v, because it is the alternative that meets study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array. When selecting a plan to propose for authorization, the Corps must consider not only benefits but the reasonableness of costs to achieve those benefits in comparing alternatives (ER 1105-2-100, p. E-164). The cost of Alternative 20 is \$645 million greater than the cost for Alternative 13v. Therefore, Alternative 13v was identified as the NER Plan.

However, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

## **Drennan Enterprises**

1. See GR-A.

### **EcoTone Studios**

1. Thank you for your comments. This study does not preclude any future land acquisitions by the City or other parties to expand the floodplain.
2. The City of Los Angeles is in the process of requesting a LOMR (letter of map revision) to FEMA that would identify the flood risks and flood zones along the Los Angeles River. That effort should be complete before any construction has begun for the current Ecosystem Restoration study. This ecosystem restoration study does not preclude any future flood risk management studies. Floodplain development is subject to local regulation.
3. The team concurs that water access is an important community desire. However, Corps guidance requires that the recreation plan be a separable component of the ecosystem restoration plan. As such, the recreation plan does not specify kayak launch sites or ramps specifically, as it is difficult to ensure compatibility with the ecosystem restoration features at this level of design. Instead, the team will incorporate water access for recreation as a complementary function of the safety/maintenance ramps that will be designed into the ecosystem restoration plan during the forthcoming Pre-construction Engineering and Design (PED) phase of the study. Further, current design for the ecosystem restoration plan includes vertical channel walls on only one side of the channel at a time, and thus access to the river at areas with vertical channel walls on one side does not preclude inclusion of water access in the more detailed design phase that occurs during PED.

### **Elysian Valley Arts Collective**

See GR-A.

### **Enterprise Community Partners, Inc**

See GR-A.

### **Environment Now**

See GR-A.

### **Film LA, Inc**

See GR-A.

### **Friends of the Los Angeles River**

1. Thank you for your detailed comments on the IFR. We recognize FoLAR's long term efforts on restoration of the river. Responses to each of your detailed comments are provided below. Historic conditions were summarized in Sections 1.2.2 and 1.2.3. The historic information we reviewed did not have sufficient level of detail to identify presence or locations of specific marsh types within the study area (including vernal marshes or alkali meadows), although the Corps does recognize that those habitat types were present within the region. The proposed project does not include restoration of these specific marsh types. The Corps made determinations about the appropriate habitats to consider for restoration based on this information, as well as the feasibility of restoring self-sustaining habitats within the study area.

Corps policy guidance states that systems "should mimic, as closely as possible, conditions that would occur in the area in the absence of human changes." The level of restoration that the Corps

can achieve "as closely as possible" to historic conditions does not necessarily equate to the uppermost limit of what is possible, and must account for project constraints. Restoration alternatives are determined by the benefits generated from an alternative as compared to the costs, as well as the overall reasonableness of cost.

The Corps follows policy guidance to determine the benefits of a given study. Because the assessment of benefits cannot be subjective or arbitrary, the Combined Habitat Assessment Protocol (CHAP) method was used to assess potential ecosystem benefits that could be achieved as compared to existing conditions. While the Corps understands that maximizing benefits is a desirable approach in the highly degraded urban setting, costs must also be considered and compared to benefits to determine the alternative that supports the wisest federal investment.

2. The Corps must examine a full range of possibilities and evaluate both ecosystem outputs and costs. The range of values must include both those that minimally meet and more fully meet objectives. Numerical criteria were identified that in Corps' judgment were neither artificially low (restoring one acre of riparian habitat would not meet objectives), nor artificially high.

Overly high numerical criteria can improperly limit the range of alternatives. Criteria were based on the assumed minimal increase in habitat necessary to support a meaningful opportunity for expanded wildlife usage and or population density. These assumptions were based on literature research and best professional judgment. Riparian habitat criteria, for instance, included the minimal acreage necessary to support nesting and foraging for the federally threatened least Bell's vireo, based on an approximate average of values found in literature. Where the performance criteria for an objective state that at least one of a given feature is required, it does not limit restoration to only one such feature. Furthermore, the study does not preclude other agencies from performing complementary restoration in neighboring areas along the river.

3. Refer to responses 1 and 2 and GR-B.

4. Reaches with existing vegetation in the channel (4-6) contain trees and will be restored by removing trash and non-native vegetation. In reaches 2 and 3, overbank areas would be restored with trees in addition to shrubs and herbaceous vegetation. In Reach 7, restoration at Arroyo Seco would include installation of riparian trees. In this way, Reaches 2-7 are restored with trees in addition to shrubs. Table 4-8 describes which of the alternatives met this objective, and each of the final array of alternatives met the objective as described.

5. The intent of the objective related to riparian (least Bell's vireo) habitat was to focus on the linear width of habitat patches restored, which could be supported by flows/channels either from within the site, or from the adjacent river channel. The focus of this objective was not on how the habitat is restored, but on its location and size (river adjacent parcels that based on a literature investigation were deemed large enough to attract and support nesting vireo pairs).

6. Refer to response 2.

7. While the language specifies "San Gabriel and Verdugo Mountains", the criteria identifies that at least one major tributary connection should be restored (i.e. San Gabriel and/or Verdugo Mountains). In this way, Alternative 13 satisfies this criteria through restoration of the Arroyo Seco confluence, with connectivity to the San Gabriel Mountains. The IFR has been revised in Section 4.2.2 Item 2a to clarify this point.

8. Refer to Response 2 and GR-B.

9. The verbatim language identifies that connections be made to nearby ecological zones "such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains." This does not specify that every ecological zone must be connected to the river in order to meet

objectives. Per the sub-objective, the requirement to meet the objective is that "at least one major tributary connection should be restored". Alternative 13 meets this criteria with restoration of the Arroyo Seco with connectivity to the San Gabriel Mountains. See response 2.

10. The Figures in Chapter 6 (Figure 6-5) are simplified connectivity maps that encompass the entire project area. To get an accurate view of the restoration measures proposed to be implemented, refer to Figures 4-5 to 4-20 (end of Chapter 4). These maps display measures such as overbank and channel wall plantings that are not explicitly shown in the connectivity maps. By referring to the Figures in Chapter 4, connectivity through all 8 reaches in Alternative 13 can be seen.

11. Refer to Response 2. Each alternative daylights many streams that are currently confined to culverts. Specific stream connections proposed with various alternatives were identified based on a series of charrettes with numerous stakeholders early in the planning process.

12. The Corps acknowledges that there are many benefits provided by the proposed alternatives. However, there is no one model in existence that would capture all the benefits described - including habitat, connectivity, air quality, recreation, economic, and social benefits.

Since the Corps mission is ecosystem restoration, and since the Corps does not have mission areas for water quality, air quality, recreation, and aesthetics, these additional benefits are considered ancillary and incidental to restoration efforts. Other benefits are described qualitatively and considered after evaluation of restoration benefits. The model used to evaluate benefits for this restoration project (CHAP) focuses on the direct outputs of ecosystem restoration, per Corps mission and policy guidance.

While the CHAP methodology did not capture all benefits, it is based on more than just vegetation in terms of shrubs and trees. In addition to vegetation, the CHAP method considers wildlife species and the functions they provide in the ecosystem, as well as more specific habitat elements found in a particular vegetation community. The details of the CHAP method are described in Appendix G.

13. See GR-B.

14. Refer to Response 13. Evaluation of the study area as located in a biodiversity hotspot was completed at a qualitative level in Section 2.1 under Resource Significance. Descriptions of the rarity of the Mediterranean climate will be added. No known formal model is capable of capturing the quantitative value of all components.

15. Refer to Response 12.

16. Refer to Responses 12 and 13.

17. Refer to Response 13.

18. Refer to Response 13.

19. Refer to Responses 12 and 23. Water quality benefits were qualitatively described in Section 5.4.3 of the Draft IFR. Water quality benefits (for human consumption purposes) are considered as ancillary, incidental benefits. Because the Corps mission and project objectives focus on ecosystem restoration, the benefits of habitat restoration are primarily considered. Improving water quality can only be an objective to the extent it is necessary to achieve ecosystem benefits. In this case, the quality and amount of water available is not the primary limiting factor that is precluding establishment of native habitats. Once the proposed modifications to the channel and overbank structures and topography are implemented, planting/seeding is established and water is redirected into these areas, then successful restoration should be achieved. Additional improvements that result from habitat restoration (i.e., filtration, infiltration, and removal of

suspended sediments or contaminants through natural processes) are expected to occur, but are not the driving factors.

20. The reference to “small mammals” was made in error and the report will be revised accordingly. The species list was based on input from local resource agencies as to the potential for species to occur within the study area. Coyote and bobcat were included on the list. The appendix will be edited to read “mammals” and avoid misunderstanding of the types of mammals considered.

The potential for reintroduction of threatened and endangered species is considered as part of the national significance of the project, as discussed in the resource significance section of the IFR. The reintroduction of listed species, however, is not a project objective. Rather, the goal is to create (restore) habitat conditions that would be conducive to use by multiple species that would occur in a urban/wildland interface, including federally listed species such as vireo.

The Corps recognizes that the narrative does not include an exhaustive list of species. Providing an inventory of all species occurring in the study area, or with potential to occur in the study area, is not the focus of the Report. Nor would providing such an inventory accomplish more in terms of identifying national significance or benefits. It would not affect the decision process, which is focused primarily on the extent and value of habitat restoration for the general types of species that utilize this area. The document describes species generally and provides sufficient information to evaluate impacts of the proposed project to various guilds. Section 5.5.3 provides a discussion of impacts to wildlife for each alternative as well as impacts to wildlife movement. The Corps determined that the major benefits of restoration are related more to the expansion of wildlife populations within and through the restored habitat areas, as opposed to dramatic increases in species diversity. A diversity of species already exists within the ARBOR area, particularly in the riparian vegetated Glendale Narrows.

21. Refer to Responses 12 and 23.

22. Refer to Responses 12 and 23.

23. Refer to Response 13, which discusses the Corps’ supplemental analysis of connectivity benefits.

Identification of the NER Plan is based upon evaluating ecosystem restoration outputs relative to costs. Other incidental benefits (such as water quality, air quality, social effects and regional economic development benefits) may be realized but they are not the basis for NER Plan identification or Federal interest. Focusing on ecosystem outputs (including habitat and connectivity) relative to costs shows that there are substantial increases in incremental cost per output for Alternatives 16 and 20 relative to Alternative 13, which was identified as the NER Plan in the Draft IFR.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. This variation on

Alternative 13 has been identified as the NER plan in the Final IFR on the basis of the analysis referenced above.

The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. When also factoring in the key consideration of reasonableness of cost, Alternative 13v is a more efficient alternative. However, the non-Federal sponsor requested that Alternative 20 be the Recommended Plan instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

24. Thank you for your comment. The Corps has examined the referenced website and the Griffith Park Wildlife Management Plan. The Corps has revised the IFR to reference the Griffith Park Wildlife Management Plan and the on-going studies on wildlife movement of large mammals.

25. The Corps acknowledges the importance of Verdugo Wash, LATC site, and LA State Historic Park for connectivity, and that Alternative 20 provides the greatest connectivity of the final array plans.

Regarding the comments relating to connectivity, these outputs were considered in the evaluation and comparison of alternatives which led to the identification of Alternative 13 as the NER plan in the Draft IFR. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost as previously stated.

Further, in response to Independent External Peer Review comments, connectivity benefits were quantified in greater detail, combined with habitat outputs from the CHAP model and subject to additional cost effectiveness and incremental analyses. See response GR-B. Such analysis substantiated that the incremental costs per output are significantly higher for Alternative 20.



Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan. Accordingly, Alternative 13v has been identified as the NER plan. However, as noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan. See response to 23 above.

26. Arroyo Seco is also a node greater than 5 acres that is included beginning in Alternative 13. Regarding the Cornfields site, the Corps can only count benefits for restored areas within its study area. Since the remainder of the Cornfields site was not included in the study area due to its current use as a park, the remaining 41 acres cannot be included in the benefits analysis.

27. The major benefits of restoration are related more to the expansion of wildlife populations within and through the restored habitat areas, although we recognize and anticipate some increase in species diversity. A large diversity of species already exists within the ARBOR area, particularly in the riparian vegetated Glendale Narrows. See also Response 20.

28. Refer to Responses 2 and 13. While some projects may utilize indicator species to compare restoration alternatives a habitat model (CHAP) was used to measure benefits and compare alternatives. The Monitoring and Adaptive Management Plan will discuss success criteria.

29. Refer to Response 13.

30. The Corps recognizes that there are many studies available for reference. The Corps conducted sufficient research of applicable reports, and consulted with local resource agencies and other experts. The qualitative analysis considered species that do not currently occur within the study area that may move through the restored environment, and documents the detrimental effect of habitat loss and fragmentation.

31. It is recognized that Alternative 20, as the largest of the final array plans, would generate the greatest benefits to the regional economy (RED Account). Further, due to its larger scale, Alternative 20 would provide additional social effects (OSE) benefits (as analyzed and described in the IFR). However, the primary focus of the project is ecosystem restoration. The Corps recommends the plan that is the National Ecosystem Restoration (NER) Plan. In this case, the NER Plan was identified in the Draft IFR as Alternative 13, because it met study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the

Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. After further analysis including cost updates, the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan. See response to 23 above.

However, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA (CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

32. As noted in these comments, the IFR identified the substantial RED benefits that could be realized in the Chinatown-Cornfields area with the larger scale restoration features included under Alternative 20 relative to Alternative 13. However, these benefits are included with the Alternative 13 variation (Alternative 13v), which includes the LA State Historic Park (Chinatown-Cornfields) plan for Reach 7.

33. The IFR recognizes that the larger scale restoration features included under Alternative 20 relative to Alternative 13v would accommodate greater opportunities for recreation development and would also provide greater OSE benefits. These benefits were among those that led to the decision to support the recommendation of Alternative 20 as the Locally Preferred Plan.

34. Refer to Responses 2, 12, and 25.

35. Refer to Responses 2, 13, 23, and 25.

36. Refer to Responses 1, 2, and 25.

37. Refer to Response 25. When selecting the NER plan, the Corps must consider not only benefits but the reasonableness of costs to achieve those benefits in comparing alternatives (ER 1105-2-100, p. E-164).

38. The criteria referenced on page 6-42 include decision criteria from the Principles and Guidelines and include effectiveness, efficiency, completeness, and acceptability. Alternative 13v has been identified as the NER plan as it provides the greatest amount of ecosystem restoration output for the investment cost. However, Alternative 20 has been identified as a Locally Preferred Plan. In a letter dated April 10, 2014, the City of Los Angeles requested selection of Alternative 20 as the Recommended Plan at a cost-share scenario different from traditional Corps policy. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memo dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the

requested LPP exception and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

39. Refer to responses 12, 23, and 25.

#### **FoLAR -- Press Articles submission**

Comment noted. Thank you for your input. These references will be included in the administrative record for this study.

#### **Glassell Park Improvement Association**

See GR-A.

#### **Glendale Rancho Neighborhood Association**

See GR-A.

#### **Great Ecology**

1. Comment noted. See GR-A.

2. Regarding the comments relating to connectivity, these outputs were considered in the evaluation and comparison of alternatives, which led to the identification of Alternative 13 as the NER and tentatively selected plan in the Draft IFR. Further, in response to Independent External Peer Review comments, connectivity benefits were quantified in greater detail using IEPR recommended metrics, combined with habitat outputs from the CHAP model and subject to additional cost effectiveness and incremental analyses. See GR-B. Such analysis substantiated that the incremental costs per output are significantly higher for Alternative 20.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

However, the non-Federal sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in

the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

## **Heal the Bay**

1. See GR-A.
2. This project is proposed as part of the Corps' mission to restore habitat values in aquatic and riparian ecosystems. Water quality improvements are considered ancillary to habitat restoration. Under Corps policy, the Corps does not propose, for Civil Works implementation, restoration projects or activities that would principally result in treating or otherwise abating pollution problems caused by other parties where they have, or are likely to have, a legal responsibility for remediation or other compliance responsibility.
3. Policy requires that the Corps consider potential climate change impacts when undertaking long-term planning, setting priorities, and making decisions affecting its resources, programs, policies, and operations. Per this requirement, the IFR has incorporated climate change in the existing conditions chapter in Section 3.2, in the impacts chapter in Sections 5.2 and 5.4, and in the Hydrology and Hydraulics Appendix (E), Section 9. Because it is difficult to quantify resilience of restoration measures to climate change, the Corps intends to design all restoration features with climate change resiliency built in. Because all restoration measures are designed to consider climate change resiliency, and because the nuances between levels of restoration are difficult to quantify, including them in the CHAP would provide little meaningful cost-benefit analysis.
4. The project alternatives are formulated to address reduced habitat values for aquatic and riparian species. Peak flow reduction is not a goal or objective of this project or the Corps' ecosystem restoration program. Various restoration strategies were examined to address the project objectives, but measures and alternatives incorporating tunnels or other diversions were eliminated due to excessive cost with minimal benefit.
5. MS4 permit information has been updated.
6. There are opportunities for construction during the flood season where impacts to conveyance could be avoided. Water would only be diverted around work areas, and would then continue downstream, therefore flows will not decrease. Refer to section 5.4.3 of the IFR. Construction period diversions will not result in reduced flows, since flows will only be routed around the various work areas and will continue downstream.
7. Maintenance of the LACDA project consistent with the existing project authorization provides conveyance of flood flows. However, as part of the request for authorization of the project, the Corps would propose to modify the operations and maintenance of the LACDA project to accommodate and complement the ecosystem restoration features, while maintaining existing flood risk management levels. The restoration features would be maintained by the City while the Corps continues to maintain the channel for flood risk management. O&M of the ecosystem restoration features in perpetuity is a non-Federal sponsor requirement. Removal of invasive species is part of the proposed ecosystem restoration project, while flood risk management maintenance is funded from the Corps' Operations budget. O&M will be further detailed in the design and construction phases of the project.
8. Funding for operation and maintenance of the ecosystem restoration project is a non-Federal sponsor responsibility, as described in Section 7.5.3 of the IFR.
9. The proposed alternatives are not intended to directly address water quality or trash coming from storm drains emptying to the river, as these are local responsibilities. However, an

ancillary effect of ecosystem restoration will include water quality benefits, and the Non-Federal Sponsor will maintain the condition.

10. Minimum summer flows are comprised primarily of discharge from Tillman Water Reclamation Plant. If climate change or other conditions result in the need to capture more of this water, summer flows could be nonexistent under the No Action Alternative. The City's Bureau of Engineering has recently announced a proposal to recapture water and reduce discharges to the river. The IFR indicates that it is possible that 1) water flows cannot be assured into the future; a condition reflected by climate change adaptation policy, and 2) a reduction in water could impact restored wetlands and open waters. However, under the action alternatives, the sponsor would be required to ensure the provision of sufficient water sustain the ecosystem restoration features. A water budget for the project is included in the report as Section 4.14.7, and Appendix E.

**Historic Highland Park Neighborhood Council**

See GR-A.

**i2 Capital Group, Inc**

See GR-A.

**Kaiser Permanente**

Thank you for your comment regarding the use of your property. Currently, we have not identified your parcel as being a possible staging area. The map on page 450 of the Draft IFR contained an error and is not consistent with the real estate plan. Necessary corrections have been made in the Final IFR.

**Los Angeles County Bicycle Coalition**

See GR-A.

**Los Angeles Kayaking Club**

See GR-A.

**Los Angeles River Artists and Business Association**

See GR-A.

**LA River Expeditions**

See GR-A.

**LA River Revitalization Corporation**

1. See GR-A.
2. We appreciate your interest in seeing this study concluded and a project recommended for authorization in an expedited manner. However, it is not possible to expedite the report process further, as statutory and policy review timelines apply.

**Los Angeles Waterkeeper**

1. See GR-A.

2. Water quality improvements and pollution remediation are not part of the Corps' mission for ecosystem restoration. This project is proposed as part of the Corps' mission to restore habitat values in aquatic and riparian ecosystems. The Corps' mission does not include remediation of polluted waters or soils for which other parties have responsibility. Water quality improvements are incidental to the overall goals and objectives of this project.

### **Los Angeles World Airports**

Thank you for your letter and review of the Draft Integrated Feasibility Report (IFR).

### **Los Encinos School**

1. Thank you for the very creative and thoughtful ABC book. Thank you as well for caring and learning more about the river, and for helping to make it a better place for people and wildlife. We agree that planting native vegetation, removing trash and protecting our natural resources are all very worthwhile goals. The Corps' proposed ecosystem restoration plan will address all of those things, but its success will partly depend on you and other members of the public to keep it in good condition. We encourage you to keep up the good work!

2. See GR-A.

### **Los Feliz Improvement Association**

See GR-A.

### **Main Street Capital BIDCO**

See GR-A.

### **Mas**

See GR-A.

### **Metabolic Studio**

See GR-A.

Thank you for the information on your “Bending the River Back Into the City” proposal, which would utilize areas adjacent to, and potentially within, features of Alternative 20.

### **Mia Lehrer + Associates**

See GR-A.

### **Montrose/Verdugo City/Sparr Heights Neighborhood Association**

See GR-A.

### **Mountains Recreation & Conservation Authority**

Thank you for your comments on the IFR. Alternative 20 is one of the final array alternatives carried forward for further analysis of its benefits. However, the Corps typically recommends the plan that is the National Ecosystem Restoration (NER) Plan. In this case, the NER Plan in the Draft IFR was Alternative 13, named the ARBOR Corridor Extension (ACE), because it is the

alternative that met study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

The Recommended Plan includes a recreation plan with features that are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, interpretive signage and opportunity for environmental education, and improved public health by providing opportunities for exercise and psychological respite. The recreation plan that was initially developed to be compatible with Alternative 13 was modified to be compatible with and take advantage of the ecosystem restoration features included in Alternative 20. The features of the Alternative 20 recreation plan include additional trail improvements, pedestrian bridges, trail access points and wildlife viewing points.

Regarding a suggestion to include more recreation features and a more significant investment in recreation, please note that the recreation plans were developed in accordance with Corps regulations and policies. These policies specify the types of recreation features that are allowed at ecosystem restoration projects, as well as the intent of recreation at such projects. These regulations specify that recreation features at ecosystem restoration projects should be austere and should be developed to assure that the recreation features do not have any detrimental impacts to the primary purpose of ecosystem restoration. We expect there to be sufficient space around interpretive signage to accommodate group gathering.

Regarding the operation and maintenance costs for recreation features, these were estimated based on a percentage of the construction cost of the recreation features identified in the plan for ongoing annual maintenance. These O&M costs are not inclusive for all of the project, but are incremental above and beyond the restoration project. O&M costs for the restoration features are separately addressed.

See GR-A for a lengthier description of the plan evaluation and selection process.

**Mt. Washington Association**

See GR-A.

**National Wildlife Federation**

See GR-A and GR-B.

**Northeast Los Angeles Arts Organization**

See GR-A.

**Oaks Homeowners Association**

See GR-A.

**Oakwood School, Fourth Graders**

1. Thank you for your thoughtful comments. You will be pleased to know that the Corps is recommending Alternative 20 as a Locally Preferred Plan.

2. See GR-A.

**Pasadena Audubon Society**

See GR-A.

**Santa Monica Bay Restoration Commission**

See GR-A.

**Santa Monica Mountains Conservancy**

1. Your comments are noted; the Santa Monica Mountains Comprehensive Plan will be added to the list of institutional and technical recognition.

2. Comment noted.



3. See GR-B.
4. The Corps acknowledges that there are many benefits provided by the proposed alternatives. However, there is no one model in existence known to the Corps that would capture all the benefits described - including habitat, connectivity, rarity, air quality, recreation, economic, and social benefits. Since the Corps' primary mission in this case is ecosystem restoration, these additional benefits are considered ancillary and incidental to restoration efforts. Other benefits are described qualitatively and considered after evaluation of restoration benefits. Consideration was given to the importance of the study area as located in a biodiversity hotspot as documented in Section 2.1 under Resource Significance. Descriptions of the rarity of the Mediterranean climate will be added.
5. Refer to Response 3.
6. Refer to Responses 3 and 4. The Corps acknowledges the importance of Verdugo Wash, the LATC site, and LA State Historic Park for connectivity, and that Alternative 20 provides the greatest connectivity of the final array plans.

Alternative 13 was identified in the Draft IFR as the NER Plan, because it was the alternative that meets study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

Regarding the comments relating to connectivity, these outputs were considered in the evaluation and comparison of alternatives, which led to the identification of Alternative 13 as the NER and tentatively selected plan in the Draft IFR. Further, in response to Independent External Peer Review comments, connectivity benefits were quantified in greater detail, combined with habitat

outputs from the CHAP model and subject to additional cost effectiveness and incremental analyses. Such analysis substantiated that the incremental costs per output are significantly higher for Alternative 20. See Response GR-B. Alternative 13v is affirmed to be the NER Plan.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

7. The Corps recognizes that there are many studies available for reference, a number of which are listed in Section 1.4 and throughout the report. The Corps conducted substantial research of applicable reports, and consulted with local resource agencies and other experts. The qualitative analysis generally considered species that do not currently occur within the study area that may move through the restored environment and documents the detrimental effect of habitat loss and fragmentation.

8. Refer to Response 3.

9. Refer to Responses 3 and 4.

10. Thank you for your comment on Alternative 20 on the Los Angeles River. This alternative was one of the final array alternatives carried forward for further analysis of its benefits. As noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan.

The Recommended Plan includes a recreation plan that complements the recommended ecosystem restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

11. The Corps follows policy guidance to determine the benefits of a given study. The assessment of benefits cannot be subjective or arbitrary, therefore reviewed and approved methods are chosen to determine ecosystem benefits. While the Corps understands that maximizing benefits is a desirable approach in the highly degraded urban setting, costs must also be considered and compared to benefits to determine the alternative that supports the wisest federal investment.

Alternative 20 is both a cost effective and Best Buy plan, which is why it was one of the plans carried forward in the Final Array. As noted above, the Corps is recommending Alternative 20

as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan. Also refer to Responses 3, 4, and 6.

12. The Corps must examine a full range of possibilities and evaluate both ecosystem outputs and costs. The range of values must include both those that minimally meet and more fully meet objectives. Numerical criteria were identified that in the Corps' judgment were neither artificially low (restoring one acre of riparian habitat would not meet objectives), nor artificially high. Overly high numerical criteria can improperly limit the range of alternatives. Criteria were based on the assumed minimal increase in habitat necessary to support a meaningful opportunity for expanded wildlife usage and/or population density. These assumptions were based on literature research and best professional judgment. Riparian habitat criteria, for instance, included the minimal acreage necessary to support nesting and foraging for the federally threatened least Bell's vireo, based on an approximate average of values found in literature. Where the performance criterion for an objective states that at least one of a given feature is required, it does not limit restoration to only one such feature. Furthermore, the study does not preclude other agencies from performing complementary restoration in neighboring areas along the river.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. This variation has been identified as the NER plan on the basis of the analysis referenced above.

Alternative 13v meets all objectives. Furthermore, the study does not preclude other agencies from performing complementary restoration in neighboring areas along the river. Also refer to Responses 3, 4, 6, and 11.

13. The criteria referenced on page 6-42 include decision criteria from the Principles and Guidelines and include effectiveness, efficiency, completeness, and acceptability. Alternative 13v is identified as the NER plan as it provides the greatest amount of ecosystem restoration output for the investment cost. However, Alternative 20 has been identified as a Locally Preferred Plan. In a letter dated April 10, 2014, the City of Los Angeles requested a Locally Preferred Plan (LPP) of Alternative 20. Based on that letter the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memo dated May 27, 2014 the Assistant Secretary of the Army (Civil Works) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

14. It is recognized that Alternative 20, as the largest of the final array plans, would generate the greatest benefits to the regional economy (RED Account). As noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan (including RED, OSE and recreation).

15. See GR-A.

16. Comment noted. Habitat and trail improvements are planned in the Arroyo Seco vicinity, including a pedestrian bridge across the LA River.

### **Save LA River Open Space**

See GR-A.

### **Sherman Oaks Neighborhood Council**

See GR-A.

### **Sierra Club Angeles Chapter Crescenta Valley**

See GR-A.

### **Sierra Club Angeles Chapter Water Committee**

1. Water conservation was not an objective of this ecosystem restoration study. The Corps did consider modification to upstream facilities, but they were eliminated from further consideration due to the reasons described in the IFR. While the study does not quantify potential recharge amounts, achieving restoration goals would also provide incidental infiltration benefits. Infiltration would occur to some limited degree in all alternatives (see Section 3.4.4).

2. Regarding comments relating to the discounting of benefits and costs, all costs in the IFR are presented at constant fiscal year price levels. Interest during construction costs (IDC) are included in the investment cost estimates for alternatives presented in the report. IDC accounts for the opportunity cost of these plan expenditures during construction, prior to the completion of the project. Ecosystem restoration benefits are presented in terms of habitat units and are not monetized. Average annual habitat units were derived by taking a simple average of projected values over the 50 year period of analysis. This accounts for when benefits will be accrued as the habitat is established and matures.

Regarding comments relating to the high cost of Alternative 20, this was a key consideration in identifying the National Ecosystem Restoration Plan and Tentatively Selected Plan. Corps guidance specifies that efficiency and reasonableness of cost are key considerations in the identification of the NER Plan. Alternative 20 is substantially less efficient than Alternative 13, and the incremental cost between these alternatives is over \$600 million. These were among the key reasons that Alternative 13 was determined to be the NER in the Draft IFR. The Corps typically recommends the plan that is the National Ecosystem Restoration (NER) Plan.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively

stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan in the Final IFR.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

Regarding comments on construction phasing, the next phase of the project would be preconstruction engineering and design followed by project construction if a project is authorized. As noted, construction of a project would take a number of years, due to both project implementation realities and constraints, as well as available funding per congressional appropriations. Therefore, by necessity, the project would need to be constructed in phases. The Corps will work with the non-Federal sponsor to develop the most beneficial and logical sequence for construction of project features based on all the relevant factors. A discussion of construction sequencing is included in Section 7.5.7 in the Final IFR, in Appendix C Cost, and in Appendix F Air Quality.

3. The “Study” and the “ARBOR Study” are one and the same. Objectives for the study are outlined up front in the main document in the Executive Summary under ES.6 and in detail in the main document in Section 4.2.

4. The study took into account mammals both large and small. The reference to “small mammals” was made in error. The species list was based on input from local resource agencies as to the potential for species to occur within the study area. Coyote and bobcat were included on the list. The appendix will be edited to read “mammals” and avoid misunderstanding of the types of mammals considered. The Corps is aware of the presence of the mountain lion (P-22) in Griffith Park adjacent to the study area.

The Corps acknowledges that many stressors occur within such a highly urbanized area. Stressors were evaluated in collaboration with local resource agencies, and those listed in the report were determined to be the most impactful to vegetation/habitat elements, and have the greatest potential to affect presence or absence of wildlife within the study area. The type of trash and means of arrival in the study area were not distinguished, as all trash was considered a detriment. Regardless of size, homeless encampments were considered to have a detriment through trampling of vegetation and altering of habitat structure.

5. As indicated in the CHAP Appendix G on pages 16, 42, and 51, “Due to the large volume of data, maps, and spreadsheets, the complete set of files is available upon request from the Corps, Los Angeles District.” Files were made available upon request by commenters to allow for further evaluation.

6. The comment references maps starting on pg 17 of Appendix G. These maps reference proposed features of the alternatives; they do not include existing habitat within the study area which is referenced in your comment.
7. The Corps is not aware of osprey nests currently existing within the Taylor Yard site. Any removal of osprey nests during initial clean up of the site was not a Corps activity.
8. The outflow from the treatment plants is covered in several sections in the report. For instance, on page 3-26, we state "Discharges from the Donald C. Tillman Water Reclamation Plant upstream of the study area, and the Los Angeles-Glendale and the Burbank Water Reclamation Plants are contributors to the River, contributing 20, 15.5, and 6.4 million gallons per day, respectively, or 31, 24, and 10 cfs, respectively (City of Burbank 2013)." And also on page 3-24, "The River is an effluent-dominated waterbody. Nearly 70 percent of the volume in the River 48 is from Water Reclamation Plant tertiary-treated effluent discharged outside of storm events (Ackerman 49 2003)." And on page 3-66, we state "Greywater from Tillman Treatment Plant and the Los Angeles/Glendale Water Reclamation Plant, and stormwater from surrounding cities are discharged into the River. During the summer months these inputs may be the only source of water in the River." The Corps is aware of proposals to reduce flows to the river due to recapture efforts. As part of its commitments for the restoration project, the City of Los Angeles is required to ensure the adequate provision of water to sustain the restoration features.
9. See Response 1.
10. The final array of alternatives considered restoration of the confluences of the Arroyo Seco (Alt 13, 13v, 16, and 20) and the Verdugo Wash (Alt 20). Due to the scope and scale of complete restoration of these tributaries, the study could not include restoration of their entire length in this one project. Other Corps studies as well as projects from other agencies may provide future opportunities for restoration along the whole of those tributaries, as well as connectivity to other regional areas.
11. The IFR addresses many of the challenges faced by fish and wildlife species under existing and "future without project" conditions.
12. "Functioning ecological zones" refers to regional areas that support functioning ecosystems, such as the San Gabriel Mountains and Santa Monica Mountains. It refers to improving "habitat connectivity" to these areas.
13. Although we are not certain of the particular report referenced by the comment, the Corps is aware of several existing or potential corridors documented in literature, and the IFR addresses several opportunities for improvement throughout the document (Sections 3.5.7, 5.5).
14. Section 3.10 - Aesthetics of the report makes no such reference, and no such maps are depicted. The Glendale Narrows are encompassed in Reaches 4 to 6. In Reach 4, the river does run adjacent to Griffith Park to the west. However in Reaches 5 and 6, to the west of the river are residential and industrial uses. In describing the Aesthetics of Reaches 4 to 6, the report states in Section 3.10.1 on Page 3-68 "In some areas, the forested and scrub-shrub habitats of Griffith Park and Elysian Park can be seen rising in the west, though they are both separated from the River by roads and other development."

The IFR does not state or imply that Griffith Park has little or no habitat value. The land use section, 3.3, describes land uses in the area and clearly shows Griffith Park as Open Space/Recreation in Figures 3-5 and 3-6, which is defined in Table 3-5 as "Environmentally sensitive habitat, wildlife refuge/preserve, river, stream or floodplain, coastal bluff, vacant urban

land. State, county, city parks or beach, recreation facility, cultural center, golf course, campground.” Mapping also clearly shows the Glendale Narrows as adjacent to residential and industrial uses in Reaches 5 and 6.

15. The Corps concurs that tourism is an important component of the local economy. The breakdown of employment by industry follows the standard categories per the US Census. Tourism related employment would be largely encompassed within the categories of retail trade and arts, entertainment, recreation, accommodation and food service. The purpose of this socioeconomic data is to present a broad perspective of the Study Area economy, rather than the specific businesses and employment within the immediate area adjacent to the river. Note that the report includes an evaluation of specific opportunity areas for redevelopment that could be realized adjacent to the river under project alternatives in the regional economic development analysis.

Regarding comments on environmental justice, the IFR and Economic Appendix specifically evaluate the other social effects (OSE) associated with project alternatives. The Final IFR contains a robust environmental justice analysis in Section 3.13 and in Section 5.13. It is recognized that the study area has large lower income and minority populations, and the area has a strong need for additional parks and recreation opportunities, in particular neighborhood parks. While many of the comments on environmental justice concerns are outside the scope of this study, all alternatives would provide significant benefits to the local population, as outlined in the OSE analysis. Alternative 20 has been selected as the Locally Preferred Plan and is the Recommended Plan.

A recreation plan was also developed which is compatible with the recommended plan and does not detract from ecosystem outputs while enhancing recreation opportunities in a restored ecosystem setting. This recreation plan will also provide significant benefits to the local population. Restoration at the Verdugo Wash confluence was evaluated in the array of alternatives and is included in Alternative 20.

16. The Corps recognizes the seasonal passive recreation activities allowed in and along the river from Fletcher Drive to just upstream of Riverside Drive. The Corps participated in the development of the Los Angeles River Recreation Zone, which includes walking, birdwatching, fishing (with a license), and non-motorized boating from Memorial Day to Labor Day. Signage addressing the Recreation Zone rules including fishing rules is provided along the subject reach.

With regard to swimming, swimming is not currently allowed in the river, including within the Recreation Zone, and would not be advisable for a variety of safety and health reasons.

Marsh Park is managed by the MRCA. The map of this area will be reviewed for accuracy. However, maps of such areas are not intended to be prepared to precise scale as this would not affect the impact assessment.

With respect to bicycle trails, existing authorized bicycle trails are shown on the mapping although we realize that other trails and maintenance roads are utilized throughout the study area.

17. The model utilized to evaluate the cost effectiveness and incremental costs of project alternatives is IWR Planning Suite. Information on this model, as well as a link to download the

software, is available at the following publicly accessible website - <http://www.pmcl.com/iwrplan>. Section 6.2 of the Economic Appendix (Appendix B) describes the model, the model purpose, inputs and outputs. Primary inputs and outputs to the model are the average annual costs and habitat units for each plan. Tables 6.2 and 6.3 of the Economic Appendix show the inputs for the analysis, while subsequent tables and graphs show the outputs.

18. Section 4 of the IFR outlines the Federal Objectives as well as specific planning objectives for this feasibility study.

19. The IFR including EIS/R is considered adequate for NEPA purposes. The Final IFR will be circulated to the public for comment, but no supplemental Draft IFR is needed.

20. A public involvement summary is included in chapter 8 of the IFR. The charrette (scoping) report is available to the public upon request. The MMRP will be included in the Final IFR.

21. The surface inputs from the drainage area were assessed as part of this study, as were groundwater sources. Information in the report can be found at Section 3.4 and Appendix E. A water budget analysis was prepared that characterizes the current conditions along the ARBOR reach of the Los Angeles River and provides comparison to each of the four alternatives. The level of detail for the water budget is commensurate with that required to determine the feasibility of the proposed features. The analyses mentioned in the comment are outside the scope of work for this study.

22. As described in the IFR, once construction is complete, rail operations can return to a before-project state; thus, there would be no long-term operational impact on active rail lines. As stated in the IFR, the project would coordinate with railroad stakeholders to ensure continuous operation and appropriate safety measures. Project impacts on potential future rail projects such as line extensions would be addressed through these coordination efforts.

23. The assessment includes minimization and mitigation measures where necessary. The project description, setting and assessment are sufficient to support the feasibility phase.

24. Comment noted. Hazardous substance contamination of lands and groundwater within the study area is assessed in the report and appendices. The City will ensure that hazardous substance remediation on land needed for the project is completed prior to project construction. The sites identified as having known or likely hazardous substance contamination are not used for recreational purposes and are outside existing waters of the United States. Any remediation plan will be conducted in accordance with state regulatory agency approvals. The City will ensure proper handling, treatment and disposal of any contaminated groundwater encountered during construction.

25. The City, as part of its commitments for the project, will assess its financial capability for its share of total project costs. The proposed project would be implemented over several years. The City already owns some of the land to be utilized for the Recommended Plan.

26. This is a feasibility level planning and assessment document. Signed agreements prior to NEPA analysis are inappropriate.

27. The cumulative impacts of this project considered along with past, present and reasonably foreseeable future actions are included in the IFR in the cumulative impacts section. Some projects are too speculative to include. With respect to water availability and diversion, the City is responsible for ensuring the provision of adequate water to support the restoration features.

28. The IFR assesses current recreation opportunities within the study area and the recreation plans for the project. The IFR also assesses environmental justice impacts of the project alternatives. See sections 3.13 and 5.13. The project is not proposing any form of redevelopment which might have the potential for gentrification or low income dislocation. In the cases of



restoration of the Verdugo Wash confluence and the LATC site, businesses would be displaced, but the effects of doing so on EJ communities has been analyzed in the IFR.

29. The Corps does not agree that the document is inadequate, incomplete or based on unfounded conjectures. An EIS must be a technical, legal, scientific, and analytical document to provide for reasoned analysis among project alternatives. The differences among and the effects of the alternatives are given in sufficient detail in the IFR. The Draft IFR will not be recirculated; however, the Final IFR will be circulated for a 30-day state and agency review during which time the public may provide additional comment.

30. The comments provided in this format are difficult to follow and often include added emphasis and repeated information from the report that does not indicate what question is being asked or comment made. All reasonable efforts have been made to respond to the comments.

31. Both quantitative and qualitative assessments were conducted in the analysis. Where qualitative analyses were made or terms of art were used throughout the report they are defined within the document. References to the connectivity analysis are updated in the final IFR.

The connectivity analysis included in Chapter 6 of the report describes the percentages cited. Additional connectivity analysis was conducted and is included in the Final IFR.

Reference to costs and benefit analysis conducted as part of the study is appropriate to disclose and include in the IFR, both for Corps planning purposes under the Principles and Guidelines and under NEPA regulations. NEPA regulations at 40 CFR 1502.23 specifically state that where cost-benefit analysis is relevant to the choice among environmentally different alternatives, that analysis should be disclosed or incorporated into the document.

The report assesses environmental justice under NEPA and the Executive Order on environmental justice. The executive order directs federal agencies to identify disproportionately high and adverse impacts to environmental justice communities. The environmental justice analysis is in the IFR in sections 3.13 and 5.13.

32. The report discloses current levels of flood risk management throughout the study area. The proposed project alternatives provide ecosystem restoration. There is no planned associated flood risk management project at this time and no segmentation or piecemealing of connected actions. The project alternatives do not preclude future flood risk management studies and improvements. The Corps most recently studied flood risk management within the study area in its 1992 review report and no recommendations for increased levels of flood risk management were made for the study area, although a project was recommended for the downstream portion of the river.

With respect to water availability, a water budget for the project alternatives is included in the IFR. With respect to liquefaction, liquefaction requires soils susceptible to liquefaction, high groundwater, and seismic shaking/source. The IFR analysis concludes that neither the Recommended Plan nor any of the alternatives would induce a significant change in any of the above liquefaction required conditions. General objections to report content cannot be addressed by the Corps.

33. The groundwater figures presented in the geotechnical appendix to the IFR are based on water level data from the Geotracker database. It should be noted that this configuration is based on water levels taken at different times and is an approximation of local water levels without noting seasonal impacts. These data provide a general description of the configuration of the

groundwater conditions in the vicinity of the ARBOR. Based upon these data and visual observations of emergent seepage within the channel it is understood that groundwater is at or very near the elevation of the existing channel bottom. The groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of their impact to and from the alternative plans. The analysis in the report quoted in the comment is not dependent on project specific modeling. We do not anticipate any significant changes in the groundwater regime based on the alternatives. Therefore, development of detailed groundwater modeling is not necessary for this study.

34. See response 33. The groundwater analysis is adequate for the evaluation of alternatives

35. The groundwater model provided in the report relies upon available groundwater data. The referenced studies address site and project specific issues that are not specifically related to the concerns of the ecosystem restoration study. However, the basic data (groundwater elevations) were used to assess the impacts of groundwater on all of the alternatives. It is our opinion that the model that has been provided is adequate for its intended use.

36. Wherever the existing channel bottom is open, groundwater is in close proximity to the invert elevation. Changes in the groundwater elevation are a function of the differences in inflow and outflow which are principally impacted by climatic and seasonal weather patterns as well as man-made discharges into the channel. These conditions have persisted throughout the recent past and are expected to continue into the future relatively unchanged. Visual evidence alone suggests that both surface and groundwater conditions are sufficient to support vegetation.

37. It is the Corps' opinion that surface and groundwater connections as discussed above, from a feasibility standpoint, are adequate to evaluate project alternatives. The alternatives will rely upon the available sources of water to support vegetation.

38. Your comment is acknowledged. It is the Corps' opinion that the groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of the alternative plans. See response 33.

39. Your comment is acknowledged. It is the Corps' opinion that the overall hydrological and groundwater support of flows and support for floodplain and channel habitats throughout the Project area discussed in the IFR and its appendices are adequate with respect to the evaluation of the alternative plans. The Feasibility Study relies on existing information and institutional knowledge to support the conclusions reached for proposed habitats. Detailed surface to groundwater modeling is far beyond the scope for this study and is not needed to evaluate the alternative plans.

40. See response 33.

41. The figure is conceptual in nature and is in no way fully representative of the highly complex and interdependent surface and subsurface groundwater regimes. Nor was the figure intended to depict isolation of groundwater or surface water conditions. The double arrow was intended to imply interaction.

42. Groundwater regimes were discussed in the Geotechnical Appendix as well as in the H&H Appendix. See response 33.

43. "Blowouts" and "soil boils" can be generated anywhere where confining materials are insufficient to confine increased pore pressures that are generated by either cyclical induced stresses (in the case of seismic induced liquefaction) or sustained pressure head differential caused by flood loading. Both of these conditions are well researched and documented in the geotechnical engineering and engineering geology literature. In addition, numerous analysis procedures and design applications are available to mitigate adverse impacts from these

conditions. Seepage design of levees and flood control systems incorporate the increased flood induced pore pressure considerations and are outlined in engineering design manuals (EM 1110-2-1901 et al.). Separate from the flood induced issues, seismic induced liquefaction is routinely studied as part of typical geotechnical design in Southern California and would be studied during the design phase as required by the standard of practice and care and pertinent California State Laws. Furthermore, the levees within the project reach are of limited height and the flood loading durations are of a relatively short duration. Therefore, the potential for “blowouts” and “soil boils” is considered minimal.

44. It is acknowledged that some quantity of flow within the river is due to the emergence of groundwater. However, during storm events, groundwater emergence would be severely limited by the increased pressure head due to flows in the channel, and at some locations the pressure head may be significant enough to induce infiltration. A significant amount of this induced infiltration will likely re-emerge after the flood has subsided. Regardless of the quantity, groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of the alternative plans.

45. The IFR recognizes the historical uses of both the Taylor Yard and LATC sites. Taylor Yard is recognized as having known contamination, with LATC indicated to have likely contamination based on past and current use. The IFR development involved consultation and review of many available sources. The level of detail included in the IFR is sufficient for project alternatives analysis. It is recognized that these sites would require remediation prior to project construction, at 100% non project cost. The City would ensure the remediation of land contamination is complete prior to project construction.

46. An assessment has been completed of the utilities affected by the project that would require protection in place or relocation. These utilities are listed in the Real Estate Plan.

47. The statements in the IFR are accurate with respect to flood risk management levels, not arbitrary or subjective. Specific levels were not provided in the IFR, because the conveyance capacity varies throughout the study area reaches, and flood maps were included in Appendix E of the IFR to show impacts of flooding during various events. The Hydrology and Hydraulics Appendix provides additional information and includes details from the Corps’ 1992 LACDA Feasibility Study, which was specifically done to assess flood risks along the Los Angeles River and tributaries. Specific information on design level and approximate existing capacity level is available from the Corps and has been shared with the public on numerous occasions. The City is in the process of requesting a LOMR.

48. Comment noted. The final document will resolve such issues with cross references.

49. The report includes estimated costs for trestling of railroad tracks in Reaches 7 and 8 as part of the LERRD for the project. With respect to HTRW remediation and response, the report provides an order of magnitude estimate for the remediation, which the City would ensure is complete prior to project construction at 100% non project cost. These costs are considered when assessing feasibility but are not part of the total cost shared project costs. Remediation of all groundwater contamination within the study area and sites not affecting the project alternatives is outside the scope of remediation necessary for the project alternatives. The IFR has assessed the likelihood of contamination that would affect lands necessary for the project and assigned the costs associated with those lands’ remediation.

50. The determination of whether to prepare an EIS or an EA is not based on the study or project stage. It is typical for the Corps to prepare an EIS for complex feasibility studies. The level of design does not render the IFR inadequate or incomplete. The level of design is appropriate for

impact assessment. If additional, previously unassessed impacts are identified during design, the Corps would prepare a supplemental EIS or EA as needed.

51. The language specifically states “Similar to Alternative 10, there would be six reaches with restored riparian corridors in overbank areas (1, 2, 4, 5, 6, and 8)”. Reach 7 is dissimilar from Alternative 10 in that it performs restoration in Reach 7 in-channel at the Arroyo Seco tributary, which is why it is not encompassed in the statement on page 4-56 line 12-13. In Alternative 10, Reach 7 is restored only with daylighted streams currently encased in culverts.

52. The designs and cost estimates are prepared at a feasibility level of detail and are appropriate level of detail for an EIS/EIR. As is standard practice for a Corps of Engineers project, there is a design phase following feasibility when preconstruction engineering and design occurs. If approved, that phase will occur in the future. The documentation has been prepared with the information available at this time. If additional impacts are identified during more detailed design phases, or even during implementation, then the Corps and non-Federal sponsor will prepare and circulate a Supplemental EIS/EIR or Supplemental Environmental Assessment/Negative Declaration as appropriate.

53. LERRD costs in the Draft IFR were based on cost estimates. LERRD costs in the Final IFR are based on a gross appraisal and assessment of relocation costs. Formal relocation agreements are developed prior to project construction and after NEPA/CEQA analysis.

54. Terms of art and technical terminology, where used in the report, are explained where appropriate.

55. The preparers are aware of the locations of railroad tracks in the study area. This section was not intended to imply tracks would be relocated or closed for significant periods. Rerouting of mainline rail is not proposed. The Final IFR in Section 5.7.3 more appropriately conveys the fact that the intent is to minimize delays to rail transportation, although some delays may occur. The project proponents acknowledge that the rail lines that would be trestled to connect to lines running east along the north and south borders of the LATC site. As described in the Draft IFR, impacts from trestling a portion of the rail line, and, by extension, to rail routes using those tracks, would be short-term because the intent is to construct the trestle prior to removal of the existing rail line.

As stated in the IFR, the project would coordinate with railroad stakeholders to ensure continuous operation and appropriate safety measures. Trestling the rail lines would be part of the City of Los Angeles’ provision of LERRD for the project and the City would negotiate appropriate relocation agreements. Formal relocation agreements are inappropriate prior to NEPA compliance. The IFR includes costs of the trestling in the total project cost.

56. The trestle proposed in association with Cornfields is depicted at the end of Chapter 4, Sheet 4: Reach 6-8. Engineering designs for the bank-side and trestle tracks have not yet been completed since the project is still in the NEPA/CEQA analysis, proposal, and planning stage. The designs will be prepared by engineers to ensure their technical feasibility and safety.

57. Comment noted.

58. Comment noted. This project is not for the purpose of increased flood risk management, although maintaining existing levels of protection is a main project constraint.

59. The basis for this comment is uncertain. No pollution release due to contaminated soils or groundwater would occur with the project alternatives. The existing SFVSS plume and potential for localized groundwater contamination are acknowledged and the IFR documents the approach for the City to address such contamination during project activities such as dewatering. Proper

treatment and disposal will be performed. With respect to contaminated lands, the project will not undertake construction until hazardous substances are remediated. Cost estimates for addressing contamination are included in the IFR appendix on HTRW.

60. The recommended assumption is unwarranted. The alternatives are not expected to have a significant impact on the existing groundwater conditions. See Appendix D, Geotechnical Section 5.1 and IFR 5.4.

61. The point of the referenced section is that restored river channel with additional natural wetland and riparian vegetation will improve water quality. More detailed discussion of environmental chemistry and bioremediation is not pertinent to the well-established fact that water quality is improved by wetlands.

62. The word “biologic” will be removed from before “organisms” in the identified location. This is an editorial change that does not affect the overall analysis. Related statements are not erroneous as stated by the commenter.

63. Assessment in the IFR is based on available information including a database search. Future investigation of potential groundwater and soil HTRW issues will be addressed during PED by the non-Federal sponsor. Per Corps policy, construction will not begin until a clean site acceptable to applicable regulatory agencies has been provided to the project. The City will ensure proper handling, treatment and disposal of any contaminated groundwater encountered during construction.

64. Per CEQA guidelines, CEQA significance criteria are outlined for each environmental resource (see “Significance Criteria” from Sections 5.1 to 5.13 (except Air Quality which is in Section 5.2.3)). Significance criteria define that a significant impact would occur if those criteria were met. Significance criteria provided in this IFR are based on the environmental checklist in the California 43 Environmental Quality Act (2005) and Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (City of Los Angeles 2006) guidelines.

65. The IFR analysis is conducted at a feasibility level. Formal agreements with railroads prior to NEPA analysis are inappropriate. The Corps and City have discussed potential impacts with various rail entities. As indicated in the IFR, minimization of construction impacts on rail services is accounted for in the alternatives and would be further addressed during the design phase.

66. In this study, the hydrologic connection is considered “natural” in that water is able to flow freely between the river and the adjacent site without the use of artificial methods such as pumps, culverts, or gravity fed pipes.

67. Wildlife inhabiting the study area are expected to be accustomed to the existing urban noise levels. Furthermore, with removal of the rail operations at Piggyback Yard, noise levels may be expected to decrease in the area.

68. “Natural” is used here as a relative term based on the context of the surrounding, highly urbanized and highly degraded areas. In this study, the hydrologic connection is considered “natural” in that water is able to flow freely between the river and the adjacent site without the use of artificial methods such as pumps, culverts, gravity fed pipes, etc. Habitats generally refer to vegetation communities supporting populations of various wildlife species, again in the context of the highly urbanized setting.

69. The northwest portion of the Boyle Heights community is within Reach 8. The Northeast Los Angeles Community Plan covers portion of reaches 3-7. Information on this Plan has been added to the chapter. The USC-LA County Medical Center Master Plan area is east of Interstate

5 and east of Piggyback Yard and has no strong bearing on this project. Cumulative effects related to groundwater resources and contaminated materials are discussed in section 5.14.2. The sponsor will ensure appropriate handling, treatment and disposal of any contaminated groundwater encountered during construction in the project right-of-way; cumulative effects would only come into play where there was an immediately adjacent project and, in that case, the other project would also be expected to appropriately handle any contaminated groundwater or soils in their project footprint.

70. Approximately 1 1/2 miles of the LA River is within the Cornfield/Arroyo Seco community. A review of the CAS community plan does not uncover any substantial inconsistencies with the LAR project as the buffer area on the west side of the river is designated as a public facility.

71. Eight projects in the LA River watershed are being funded in whole or part by bonds resulting from the passage of Prop O. The projects are designed to improve water quality in the LA River watershed. New bridges proposed outside of the ones included in the project are discussed in 5.9.3. Several historic bridges in the project area are being proposed for possible replacement including the Sixth Street viaduct.

72. Comment noted.

73. The site on which on the LATC is currently located is included in all action alternatives. The provision of the LATC site would be part of the sponsor's LERRD responsibilities.

74. As described in the IFR, alternatives require the inclusion of the site where the LATC is currently located. The Corps of Engineers and City of Los Angeles are aware of the requirements involved with LERRDs and the LERRDs estimate includes those costs.

75. Your comment is acknowledged. The IFR evaluated available information. Future investigation of potential groundwater and soil HTRW issues will be addressed during PED in cooperation with the non-Federal sponsor. Per Corps policy, construction will not begin until a clean site acceptable all regulatory agencies has been provided to the project. With respect to groundwater contamination, the sponsor will be responsible for addressing groundwater contamination during construction, including appropriate treatment and disposal during dewatering activities.

76. The statements in the report are clear. Per Corps policy, construction will not begin until a clean site acceptable to regulatory agencies has been provided to the project. With respect to groundwater contamination, the sponsor will be responsible for addressing groundwater contamination during construction, including appropriate treatment and disposal during dewatering activities.

77. Your comments as to what should be considered "natural" are noted. The project proponents are aware that the channel is engineered for flood risk management. This project is seeking to restore ecosystem function as much as possible within the recognized constraints. With those constraints an entirely natural channel is not possible, but what is possible is improvement of existing ecosystem conditions.

78. The "1 percent/100-year recurrence protection" is a concept used by FEMA to assess flood insurance. The Corps of Engineers used different methods to design the Los Angeles River channel in the 1930s and 1940s. The flood risks are documented in Section 2.3 of the IFR and details are provided in the H&H Appendix (Appendix E).

79. HTRW evaluation was based on available information. The non-Federal sponsor will perform, or ensure the performance of, investigations to characterize the existence and extent of hazardous substances during the Planning Engineering and Design phase of the project. Per Corps policy, construction will not begin until a clean site acceptable to regulatory agencies has

been provided to the Corps. Methane and hydrogen sulfide as related to worker safety would be a concern as related to underground construction or confined spaces. The proposed project does not include construction measures undertaken underground or in confined spaces and no methane or hydrogen sulfide safety issues are anticipated. Standard operating procedures in accordance with federal, state, and local occupational health standards will be followed.

80. The typographical error on the title to Figure 4.15 will be corrected.

81. Comment noted; left and right banks are standard terminology when referring to a river channel. Cardinal directions were added to the text as descriptors for the public.

82. Trestles, if necessary for the recommended alternative, would be designed during PED. The typical cross sections are merely intended to show the location of the trestles, not specify design details.

83. The LATC would no longer be located on the subject site; therefore, provisions for the infrastructure in the comment are unnecessary. Trestles are only shown where they would be necessary if those measures were to be included. Not all existing infrastructure is included on the typical cross sections.

84. There is no intent to elevate the entire LATC site onto trestles. The referenced sentence in Appendix A has been revised for clarity. As previously stated the LATC site would be utilized for the project, with rail yard use no longer on site, but the existing rail lines along the river would remain in place. The corrected sentence reads, "Existing main line railroad tracks adjacent to the LATC parcel would be rebuilt on trestles at existing elevation to allow flow through and connection of the riparian zone and marsh habitat to the main channel."

85. Comment noted. See response 84.

86. Trestling plans will be determined with the affected railroads under relocation agreements between the City and the railroad.

87. Freshwater marsh can also be supported by intermittent or ephemeral water sources. The assumption is that daylighted storm drains will support wetland habitat as depicted in Figure 3.1.

88. The section being referenced is Alternative 20 in Reach 7. As shown in attachment 3, a trestle is included with implementation of restoration at this location.

89. The term biota as used here was a general reference to living organisms; it will be replaced with "habitat."

90. Comment noted. See responses to 84 and 85.

91. In Alternative 13, marsh vegetation will be planted throughout the LATC site with minimal impacts to the active rail lines, since they will be left at grade. In Alternative 16 and 20, marsh vegetation will also be planted; however, the active rail lines which run parallel to the Los Angeles River will be trestled at grade.

92. As stated throughout the report, the action alternatives that require the LATC site and the rail yard would no longer use the site. This has been captured in the LERRD cost estimates.

93. Operation and maintenance of relocated facilities and utilities will be conducted by the facility/utility owner, not as part of the project.

94. It is recognized that there are uncertainties and risks inherent to costs developed for a feasibility study. The contingencies have attempted to capture these risks in applying cost contingencies. It is understood that relocations will require coordination with railroads.

95. Your comments regarding oil seeps, H<sub>2</sub>S migration, and methane migration from natural sources are acknowledged. These occurrences are not uncommon in Southern California and have been documented in the historic literature. However, the USGS and the California Division of Oil and Gas do not indicate the presence of oil or gas seeps along the length of the ARBOR

reach. The lack of definitive locations for oil and gas seeps does not preclude the potential that they will be discovered during future investigations or during construction.

Your comments regarding potential data sources for historical uses and potential contamination sources are acknowledged. The referenced maps, while historically significant, do not definitively define the extent and quantity of potential HTRW conditions for specific sites. These maps along with other available resources are considered tools for planning the comprehensive subsurface investigations for determining the nature and extent of HTRW impacted soil and groundwater. Future studies will need to further quantify the nature and extent of recognized potential HTRW sites.

HTRW assessment was based on available information. Prior to construction, the non-Federal sponsor will perform, or ensure the performance of, investigations to characterize the existence and extent of hazardous substances. Per Corps policy, construction will not begin until a clean site, acceptable to regulatory agencies, has been provided to the Corps by the non-Federal sponsor.

The potential presence of contamination in the vicinity related to railroad operations, lumber, and coal gasification facilities is recognized. The extent and degree to which previous industrial operations have impacted specific sites cannot be fully determined until detailed site investigations can be completed. These investigations will require access to property and authorization to conduct an unencumbered investigation. When access and authorization are granted, these investigations will be completed. Review of the Department of Oil and Gas documents did not reveal the presence of shallow oil wells in the area of Reaches 7 and 8. Productive formations, sedimentary rocks that produce oil and gas, exist throughout the Los Angeles Basin. The presence of methane and hydrogen sulfide in underground excavations is not uncommon in the Los Angeles Basin given the geologic conditions and the long history of oil production. These conditions are problematic in underground work, but have not been a significant issue in open excavations. The existing Los Angeles River is an open channel and the proposed modifications will remove portions of the existing concrete lining. Methane and hydrogen sulfide that is present within the underlying bedrock is expected to emanate slowly over broad areas and is further defused as it passes through the overlying alluvial sediments that occupy the river channel. Eventually these gasses are dissipated to the atmosphere. This process has occurred for millenia and is expected to continue in the future.

96. Review of aerial photographs, historic topographic maps, site visits, personnel interviews and other investigation procedures are tools utilized in the early stages of investigation to determine previous land use and the possible impact to the property. They also assist in planning of more focused and detailed investigations. In themselves they are not definitive. The history of railroad activities at Taylor yard and LATC was evaluated by the Corps, utilizing the conditions illustrated on historic USGS topographic maps that span the period of time from 1894 to the present. From 1894 to 1928 LATC grew from a single rail track to the Southern Pacific Rail Road Shops consisting of shop buildings, extensive sidings and a roundtable. During this same time period Taylor Yard had grown to become an extensive rail yard with numerous sidings and shop buildings. By 1953 both yards were nearly identical with shop buildings, rail sidings and roundtables, and both are described as Southern Pacific Rail Road Shops. The only noted difference was the presence of above ground oil tanks at Taylor.



97. The IFR indicates that HTRW contamination is likely. It does not conclude there is no contamination based on the records review.
98. See response 95.
99. The IFR indicates that HTRW contamination at LATC is likely. The order of magnitude cost estimate for remediation is provided in the IFR. Your estimate is noted.
100. The Draft IFR bases its rough cost estimate on likely contamination from historic uses and potential methods of remediation consistent with the use of the land for ecosystem restoration purposes. Prior to construction, the City would perform or ensure the performance of investigations to characterize the existence and extent of contamination at the site.
101. Your comment is acknowledged; however, no contradiction exists as the shallow and deep components are both in an unconfined condition and are consistent with the SFVSS model. The groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of the alternative plans.
102. Your comment is acknowledged; however, the project does not require remediation of any and all groundwater contamination within the region; the groundwater contamination encountered during construction will require proper handling, treatment and disposal. Remediation of groundwater contamination unrelated to project implementation is beyond the scope of the project alternatives. It is the Corps' opinion that the groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of the alternative plans.
103. The implied geochemical reactions of anhydrous calcium sulfate, H<sub>2</sub>S and water are not relevant to the section of this report. The intent of the discussion presented was to show the existing connection between surface waters and groundwater through the current engineered pressure relief system. This interchange existed prior to construction of the existing flood control channel and will occur if and when the concrete surface linings are removed.
104. Your comment is acknowledged. The groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of their impact to and from the alternative plans. The analysis in the report quoted in the comment is not dependent on project specific modeling. We do not anticipate any significant changes in the groundwater regime based on the alternatives. Therefore, development of detailed groundwater modeling is not necessary for this study.
105. Your comment is acknowledged. The groundwater conditions discussed in the IFR and its appendices are adequate with respect to the evaluation of their impact to and from the alternative plans. The analysis in the report quoted in the comment is not dependent on project specific modeling. Detailed modeling is not required to recognize existing basic groundwater/ surface water interaction within the ARBOR reach.
106. Your comment is acknowledged. Known and suspected HTRW contamination within the study area is assessed at a feasibility level without bias for any action alternative, with order of magnitude cost estimates provided for the sites within the project alternative footprints. The City will further assess distribution and levels to develop fully detailed remediation plans. The non-Federal sponsor will ensure remediation of HTRW at 100% non-project cost.
107. Your comment is acknowledged. Known and suspected HTRW contamination within the study area is assessed at a feasibility level without bias for any action alternative, with order of magnitude cost estimates provided for the sites within the project alternative footprints. Prior to construction, the City will perform, or ensure the performance of, investigations to characterize the existence and extent of hazardous substances. The Draft IFR is clear in stating the requirements for remediation of contaminated lands prior to project construction and for

appropriate handling, treatment and disposal of contaminated groundwater encountered during construction at 100% non-project cost.

### **Silver Lake Reservoirs Conservancy**

See GR-A.

### **Studio City Neighborhood Council**

See GR-A.

### **Studio City Residents Association**

See GR-A.

### **The City Project**

1. See GR-A.
2. The primary purpose of the project is ecosystem restoration. While a secondary purpose of the project is to provide recreational opportunities consistent with the restored ecosystem, larger scale park and green space elements are beyond the project's scope.
3. Relevant information provided in your comments has been incorporated into the report. In some cases, similar references were already included in the socioeconomic sections (3.13 and 5.13) and a discussion of other social effects are found in Appendix B.
4. The Corps and the City of Los Angeles take compliance with all applicable federal, state, and local laws seriously. This includes the Executive Order concerning environmental justice. The environmental justice analysis has been updated to reflect the most current census information. The discussion of environmental justice has been expanded to more clearly address benefits to EJ communities. Also see Table 6-7 for comparison of social issues by alternative.
5. In reference to the listed steps: 1) The NER Plan and the Recommended Plan (the Locally Preferred Plan) are discussed in detail in Chapter 7. 2) An EJ analysis focuses on disproportionate adverse effects. However, additional text has been added showing the beneficial effects of the project alternatives as well in Table 5-46. 3) See Chapters 3 and 5 for analysis of alternatives. 4) Final decisions made by elected officials; opportunities to provide public comment throughout process - see Chapter 8 for details. 5) See response to point 2 above.
6. The Corps and the City of Los Angeles take protection and preservation of Native American cultural resources very seriously. As stated in the IFR, "The USACE contacted the California Native America Heritage Commission for a search of the Sacred Lands Inventory file to determine if there is any record of sensitive sites or traditional cultural properties that may be present and to obtain the most current list of Native American contacts for consultation. The Native America Heritage Commission responded that there were Native American cultural resources present and provided a list of tribal contacts for the USACE for consultation on these resources. The USACE contacted tribal representatives by letter in September of 2012. To date no responses have been received by the USACE. The USACE will continue efforts to inform and consult with tribal representatives regarding any cultural concerns that they might have. A copy of the draft EIS will be sent to the tribal contacts for their review and at each stage of the Section 106 process they will be invited to comment and participate." Furthermore, the IFR also states that "Focused, site-specific consultations would be conducted with Native American individuals and tribes and other ethnic communities to determine whether there are particular areas where there may be traditional cultural concerns."

7. A memorandum on health considerations has been added to section 5.11, Public Health and Safety, in the IFR.
8. Thank you for your suggestion to promote economic vitality through green jobs programs for diverse local youth and other residents, which will be considered by the City. It should be noted that the project's principal objective addresses habitat restoration, not job creation.
9. The primary purpose of the proposed project and alternatives considered in this Study is to restore approximately 11 miles of the Los Angeles River from Griffith Park to Downtown Los Angeles by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries, its historic floodplain, and the regional habitat zones of the Santa Monica, San Gabriel, and Verdugo mountain ranges while maintaining existing levels of flood risk management. A secondary purpose is to provide recreational opportunities consistent with the restored ecosystem. The analysis includes an examination of whether or not there are disproportional adverse effects of the alternatives; this is different than assuring equal benefits or access to new improvements.
10. Comment noted. Also see response to number 6 above.
11. A number of habitat and riverbank improvements have been examined – see Chapter 4 of the IFR.
12. Comment noted. The project purpose relates to restoring a portion of the Los Angeles River and, secondarily, providing recreational opportunities consistent with the restored ecosystem. New multi-use walking and biking paths would be constructed as part of the project. Providing transportation improvements for access is beyond the scope of the project and should be addressed in other planning venues.
13. The Corps and the City of Los Angeles have been and remain committed to extensive public outreach effort on this project. See Chapter 8 (Public Involvement) in the IFR, including efforts aimed at environmental justice communities. Continued opportunities for public input will be offered as the project moves forward.

### **The Nature Conservancy**

1. Thank you for your comments. We have incorporated relevant information regarding the Mediterranean biome into the IFR in Section 2.1.1 under Technical Recognition. Please see GR-A for a detailed overview of the evaluation and selection of the recommended plan.
2. The Corps agrees that other areas in the watershed play a role in the ecological function of the LA River system. It is true that these areas would require separate studies, which could build upon restoration activities in the LA River Ecosystem Restoration project to design a more comprehensive system.
3. Benefits are discussed in detail in the CHAP Appendix G. Because this is an ecosystem restoration project, the focus is on benefits afforded by restoration, including restoration of habitat. The benefits are based on habitat and potential for supporting species, not specifically on occupation. In this case native fish species may need to be reintroduced by other agencies/entities. Benefits are quantified via the CHAP analysis, as described in Appendix G. Other benefits, including those to recreation and economic development are also discussed in Section 6.5 - and are considered in decision making. The benefits of restored connectivity are also discussed in Section 6.3.1 as well as Section 5.5. Ultimately, the benefits to habitat vs. the costs of the project are the driving factor in the final decision.

This report is drafted at a feasibility level. Any design details that would be required to facilitate restoration of fish populations would be specified and incorporated during the detailed design phase of the project.

4. Alternatives are not formulated for particular species. Per Corps guidance, alternative formulation for restoration is based on the historic habitats that occurred in the area prior to human intervention. Based on an assessment of historic conditions, riparian and marsh communities were known to be present along the river within the study area. Therefore, these habitats are the focus for restoration. The CHAP habitat evaluation team determined what habitat conditions and habitat elements might exist both with and without project 50 years into the future, and identified the types of species that could use those habitats.

Species that may inhabit these vegetation communities, including those that may already exist on the river, are expected to use the restored communities as well. Threatened and endangered species known to occur in the vicinity would also have the potential to occur in restored areas.

The document describes species generally and provides sufficient information to evaluate impacts of the proposed project to various guilds. Section 5.5.3 provides a discussion of impacts to wildlife for each alternative as well as impacts to wildlife movement. Biodiversity is discussed in several locations in the report, including in the habitat evaluation model (CHAP) included in Section 4.9.1.

5. The value of regional habitat areas was considered in that the Corps qualitatively addressed the value of connectivity to these areas and the importance of this connectivity. The focus of the study is not to determine the specific value of lands outside of the project limits or evaluate their specific resources, but to identify how and where the project would improve the ability for wildlife to move to and from those areas. The purpose of the report is to evaluate the impacts of the proposed project, which is provided in Section 5, and sufficient information is present to determine impacts to regional connectivity. Per public comments, the Corps also quantitatively valued connectivity, as described below. The Corps recognizes the value of these regional areas, which is why connecting to them is a primary objective of the study. Also refer to Response 4. See GR-B.

6. The interpretation that “the channel construction, according to the Report, was based on originally defective design criteria” is incorrect. The H&H Appendix instead states the criteria used for the original design is different than what we use today. It is true that one of the major constraints for the ecosystem restoration study is that the proposed features will not reduce the flood risk management levels afforded by the existing channel. The Corps plans to adopt a course of action that allows for ecosystem restoration while not reducing the current conveyance of the Los Angeles River. You are correct that additional engineering features may need to be included at critical locations if concrete is removed from the channel. These will be designed during the detailed design phase of the study. Vegetation could elevate flood risks if allowed to grow unchecked. Therefore, the study will also include an Adaptive Management Plan, a Monitoring Plan, and an O&M Plan to address these issues. The project will be designed to avoid impacts to flood risk management. This is true for any other modifications in the future downstream of the proposed LA River project.

7. The descriptions will be revised to reflect these corrections.

8. The description will be revised to reflect these corrections.

9. These categories are based on habitat types generated by the Northwest Habitat Institute for the CHAP analysis, which are cross-walked with other more local vegetation community naming conventions. The habitat type is categorized broadly and it is recognized that there is more diversity within each category.

10. Refer to Response 9. The difference in categories was based on the plant species and habitat elements that were observed in each area. The section of the report is a summary of the cover type mapping more completely described in Appendix G. "Pasture agricultural" refers to areas considered pasture and mainly covered with Bermuda grass and utilized as pastures while low density urban includes a mix of uses and cover as described in the report.

11. While authorization allows the Corps to remove vegetation to maintain flood capacity, in practice vegetation management in the channel has been subject to both funding constraints and a minimization of impacts to native species that have come to inhabit the vegetation when that limited funding is available. Recent practices have been limited to removal of non-native invasives in select areas, as determined by funding availability. This allows the Corps to provide flood capacity while minimizing impact to native habitat and species. The referenced text will be revised to reflect this more specific response. The Corps will conduct more detailed H&H analysis and determine the level of vegetation that can be maintained within the river. Vegetation maintenance by both the Corps and the City may be required to maintain the LACDA (by the Corps) or to comply with ecosystem restoration project constraints (City).

12. Cover type mapping and descriptions are included in Appendix G, which includes more details pertaining to existing habitat. The Corps recognizes that the discussions in Section 3.5.4 and 5.5.4 do not include an exhaustive list and inventory of species. The document describes species generally and provides sufficient information to evaluate impacts of the proposed project to various habitat types. Section 5.5.3 provides a discussion of impacts to vegetation and wildlife for each alternative.

In compliance with CEQA, special status species were considered in the preparation of Appendix H in the following manner: In preparing the biological resources section of the EIS/EIR/IFR, we reviewed information from several sources, including the CNDDDB for the USGS quads that cover the ARBOR Reach and tributaries, the USFWS and CDFW species list for the Los Angeles County area, and the California Native Plant Society list (focusing primarily on 1A and 1B plant species from the CNPS list). Once the list was narrowed to those species that could potentially be found in habitats that occur in riparian areas in southern CA waterways, the list was further refined based on habitats that were identified in the CHAP appendix. Sensitive species that were determined to be likely to occur in the study area were discussed in Sections 3.5.4 and 5.5.4 of the Draft IFR. All other species with the potential to occur in historically-occurring habitats were listed in the tables in the Appendix H. The comment letter specifically mentioned *A. pulchra pulchra*. This species requires loose soils in chaparral or pine-oak woodlands, a habitat type that may well occur in the watershed but not in the study reach. This species was identified as being "Not Likely to Occur" and has been added to the appendix.

13. Refer to Response 12 and 17.

14. The list of 28 species included in the main body of the report includes those species that have been identified in the region and which may be found in riparian, wetland, aquatic, grassland, or urban areas during any part of their lifecycle. Other sensitive species were listed in Appendix H.

15. The text has been revised to accurately identify the presence or absence of sensitive bird species.
16. The references were examined and text revised as appropriate.
17. The text has been revised to clarify that wildlife movement is being studied by other entities (not part of this feasibility study), and that while the movement of specific species is not yet well known, it is generally diminished due to installation of urban infrastructure.
18. The Corps recognizes that the narrative does not include an exhaustive list of species. Providing an inventory of all species occurring in the study area, or with potential to occur in the study area, is not the focus of the Report. The document describes species generally and provides sufficient information to evaluate impacts of the proposed project to various guilds. Section 5.5.3 provides a discussion of impacts to wildlife for each alternative as well as impacts to wildlife movement.

Plant species were accounted for in the CHAP via the inventory of habitat types and habitat elements. Despite the exclusion of invertebrates, CHAP was independently peer reviewed and found by the Corps Ecosystem Center for Expertise to be sufficient for capturing habitat benefits at the level needed in order to compare the final array of alternatives. It is expected the restored habitats in the final array of alternatives would provide for a similar diversity of invertebrates, and would therefore not influence the decision on the recommended plan.

## **The River Project**

1. Policy requires that the Corps consider potential climate change impacts when undertaking long-term planning, setting priorities, and making decisions affecting its resources, programs, policies, and operations. Per this requirement, the IFR has incorporated climate change in the existing conditions chapter in Section 3.2, in the impacts chapter in Sections 5.2 and 5.4, and in the Hydrology and Hydraulics Appendix (E), Section 9. Because it is difficult to quantify resilience of restoration measures to climate change, the Corps intends to design all restoration features with climate change resiliency built in.
2. The Corps addressed flood risk management in several areas of the IFR and appendices. Maintaining flood risk management is the major constraint of the study. All existing and future engineering for the IFR-EIS is predicated on the requirement that no changes will be made to flood conveyance capacity. Flood risk management was not included as an objective of the study, but future studies for flood risk management are not precluded by the action alternatives.
3. Changes to upstream watershed conditions will likely continue to occur over time. However, quantifying those changes poses difficulty when trying to make meaningful predictions. Further, the scope of the IFR is determined by Corps ecosystem restoration goals.
4. Local and regional water resources are considered in our water budget for the ecosystem restoration. Water conservation, recharge and similar efforts are beyond the scope of this study.
5. The study scope did not affect consideration of widening the river. As discussed in the IFR, widening throughout the study reach was considered conceptually, but dismissed due to extremely high costs (over \$7 Billion in real estate costs alone, without construction costs), substantial displacement of residents, and major impacts to critical infrastructure. The study team examined lands throughout the study corridor for their inclusion in project alternatives and identified locations where widening could occur.
6. Following construction, operation will be guided by a Monitoring and Adaptive Management Plan and Operation and Maintenance Plan to ensure that proper operation, maintenance, and

adaptive management are implemented. Concerns regarding proper implementation are noted. It is inaccurate to refer to the restoration features as landscaping or an economic development plan. The study alternatives provide restoration features that reestablish lost and degraded river functions and habitat within the challenging constraints presented.

7. Comment noted. The LACDA project continues to provide flood risk management to the Los Angeles region. No requests for deauthorization have been made by the sponsor. The proposed restoration project and the LACDA within the study area would be designed to have complementary O&M plans.

### **The Trust for Public Land**

See GR-A. Thank you for the information provided; it will be reviewed and incorporated as applicable. The public comments influenced the Sponsor request for the LPP and the Corps approval of the LPP as the Recommended Plan, which includes more restoration and a larger recreation plan that takes advantage of the additional features of the larger plan.

### **Theodore Payne Foundation**

See GR-A.

### **TreePeople**

See GR-A.

### **UC Berkeley, Dept of Landscape Architecture and Environmental Planning**

1. Noted. See GR-A regarding costs.
2. Regarding the comments relating to connectivity, these outputs were considered in the evaluation and comparison of alternatives which led to the identification of Alternative 13 as the NER and tentatively selected plan. Further, in response to Independent External Peer Review comments, connectivity benefits were quantified in greater detail, combined with habitat outputs from the CHAP model and subject to additional cost effectiveness and incremental analyses. See Response GR-B. Such analysis substantiated that the incremental costs per output are significantly higher for Alternative 20, and therefore, when also factoring in the key consideration of reasonableness of cost, there was not sufficient justification to select a larger scale plan as the NER Plan.

Following public review, a detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan

requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

However, as noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan. See GR-B. It should also be noted that the habitat units generated by CHAP did not capture all benefits associated with ecosystem restoration. No one model captures every element for consideration. The CHAP assessment was used to identify the final array of alternatives. Additional comparisons were made to assess restoration of hydrologic and hydraulic function and nodal (local) and regional habitat connectivity.

3. Alternative 20 is both a cost effective and Best Buy plan, which is why it was one of the four plans carried forward in the Final Array. While Alternative 20 is a Best Buy Plan, it provides diminishing returns, i.e., the incremental costs per output for this plan are substantially higher than for Alternative 13. Hence, this plan is significantly less efficient than Alternative 13. Alternative 13 was identified as the NER Plan in the Draft IFR, because it was the alternative that meets study objectives while providing the greatest increase in net benefits with the least increase in cost among alternatives in the final array.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets the criteria for selection of the NER plan. Accordingly, Alternative 13v has been identified as the NER plan.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

4. The alternatives that required tunneling were evaluated in an early iteration of the CE/ICA analysis. This analysis showed that the incremental output associated with including plans that added tunneling was minimal, while the costs were very high (over \$2 Billion for the smallest tunneling plan). Accordingly, it was apparent that there was no justification for carrying forward the plans requiring tunneling for further consideration. While the incremental costs for



Alternatives 16 and 20 relative to Alternative 13 are lower than the incremental cost of plans that includes tunneling relative to Alternative 20, this does not change the key conclusions of the analysis. Specifically, Alternative 13 was identified in the Draft IFR as a more efficient plan than Alternative 20, based upon incremental costs per output, and the differential in costs between Alternative 13 and 20 is very large. Therefore, the fact that the tunneling plans were not carried forward throughout the CE/ICA analysis did not impact NER plan identification.

See responses 2 and 3 above for a discussion of the identification of Alternative 13v as the NER Plan and the identification of Alternative 20 as the Recommended Plan.

5. Recreation is an essential part of a healthy and vibrant community, particularly where urban conditions prevail. However, the project is primarily one for ecosystem restoration. Under Corps policy, Recreation included as part of ecosystem restoration projects must be compatible with the ecosystem restoration purpose of the project and appropriate in scope and scale to the opportunity provided by ecosystem restoration projects. Recreation development should not require additional lands, and should be ancillary to restoration benefits. As such, recreational value did not factor into the CE/ICA.

6. Comment noted.

7. As stated in the IFR, there is no sponsor available to study flood risk management at this time. The lack of an available sponsor is unrelated to the Corps' current operation and maintenance responsibility for the channel in the restoration study area. As described in the H&H Appendix, the flood risks vary along the project reach. This is due to several factors including: vegetation in the channel, the original design was based on a smaller design event than would be used today, the amount of urbanization was not anticipated to be so vast, and updated hydrologic and hydraulic criteria. It should be noted that the Corps studied flood risk management along the Los Angeles River recently in the 1990s as part of a review of the LACDA. That study resulted in channel improvements, consisting primarily of floodwalls along the lower Los Angeles River and the Rio Hondo Diversion Channel. Although the 1992 report identified the potential flood conditions along the upper Los Angeles River, no improvements to the upper Los Angeles River, including the ARBOR reach, were economically justified at that time.

Although the current study does not have flood risk management as one of its objectives, one of the major constraints for this study was there would be no adverse impacts to the current flood risk management along the Los Angeles River. As such, any modifications to the channel will entail detailed engineering analyses to ensure the project will not adversely impact channel capacity or structural stability of the existing channel. The Recommended Plan will not increase flood risks nor residual flood risks for all reaches of the Los Angeles River.

## **UC San Diego**

See GR-A.

## **Union Pacific Rail Road**

1. Thank you for your comments on the Los Angeles River Ecosystem Restoration Feasibility Study. We will change the reference to the subject facility to the "Los Angeles Trailer and Container Intermodal Facility" or LATC throughout the Final IFR in accordance with your comment.

2. Union Pacific's opposition to action alternatives 10, 13, 16 and 20 because they would require the conversion of the LATC property from its current use to riparian/wetland is noted. We are also in receipt of your letter of March 28, 2014, which indicates that it is possible that Union Pacific could reach a sale or exchange agreement with the City of Los Angeles. The Corps does not agree that the NEPA/CEQA analysis in the IFR is flawed, that the Draft IFR includes inappropriate assumptions about the feasibility of relocating the LATC, or that the Draft IFR fails to evaluate relevant factors. Each of Union Pacific's detailed comments are addressed in the applicable impacts sections of Chapter 5.

3. We appreciate the information on the LATC's current operations and improvements.

4. Comment noted. We are aware of the Surface Transportation Board's role in rail regulation.

5. The Corps disagrees that the Draft IFR identifies all impacts listed in the comment as significant and adverse. Each of these resource impacts is addressed below in responses 6 and 7.

6. Effects on rail operations other than LATC: Under all action alternatives, the LATC yard would be required for project features. The alternatives differ regarding the types of site modifications that would occur. As described in the IFR, existing rail lines along the river channel would be trestled at grade in Reach 8 under Alternative 16 and in Reaches 7 and 8 under Alternative 20, with excavation below existing grade to reconnect the river to its historic floodplain in Reach 8 and provide a terraced connection in Reach 7. Every effort would be made to construct the trestles with a minimum of disturbance to rail operations, with only short term impacts. The Draft IFR discussion of trestling was not intended to imply tracks would be relocated or closed for significant periods. Rerouting of mainline rail is not proposed. The Final IFR has been revised to more appropriately convey the fact that the intent is to minimize delays to rail transportation, although some delays may occur. Impacts to rail lines that would be trestled are not anticipated to be significant and adverse. References in the Draft IFR table cited and elsewhere in the IFR have been revised to clarify the impacts to rail lines during trestling. As stated in the IFR, the project would coordinate with railroad stakeholders to ensure continuous operation and appropriate safety measures. Trestling the rail lines would be part of the City of Los Angeles' provision of LERRD for the project and the City would negotiate appropriate relocation agreements. With respect to spur lines and rail capacity, the only permanent impacts would be to the LATC site. As discussed in the Final IFR, following public review, further detailed cost analysis was performed, which identified a more cost effective variation on Alternative 13 (referred to in the IFR as "Alternative 13v" for "variation"). Alternative 13v is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco; this variation is within the spectrum of alternatives evaluated in the Draft IFR. This variation would require trestling along the right bank of the channel in Reach 7 but not the left bank in Reach 8. This variation is identified as the NER plan in the Final IFR. However, Alternative 20 is the Locally Preferred Plan and the Recommended Plan in the Final IFR. Alternative 20 requires trestling on both sides of the river.

7. With respect to socioeconomic and environmental justice impacts, some portions of the comment are in error. The Draft IFR did not conclude that all jobs at the LATC site would be permanently eliminated or that the impacts to environmental justice communities within the study area would be disproportionately significant and adverse. Rather, the Draft IFR indicated that if all or most LATC jobs were held by members of environmental justice communities in the

census tracts around the LATC, and if all or most employees could not retain their positions at a replacement facility within the region, there was potential for disproportionate impact to environmental justice communities. However, analysis has not shown that all jobs would be eliminated from the region or that all jobs are held by members of environmental justice communities around the LATC. As emphasized by Union Pacific, the LATC functions are a critical component of Union Pacific's domestic intermodal traffic network. Based on the assumption that these functions are critical as represented, it is anticipated that these functions would be relocated elsewhere. Extensive comments from City residents, stakeholders, and other agencies received during the comment period have emphasized the significant positive impacts for environmental justice communities from the implementation of the project alternatives, in particular Alternative 20, the Recommended Plan. Comments pointed to increased public health benefits, job creation (both directly from construction and indirectly from redevelopment), increased community cohesion and other factors. Elaboration on the potential impacts, both positive and negative, to environmental justice communities is included in the Final IFR. While the Draft IFR acknowledges the conflict with the Industrial land use designation caused by the inclusion of the LATC site in project alternatives, the IFR adequately discloses these impacts, and alternatives that met the purpose and need while avoiding the LATC site were not identified. Additional discussion is provided in Response 8, below.

**Air Quality:** The construction schedule for all alternatives has been revised to further reduce effects on air quality. Air quality impacts during peak construction periods for all alternatives would have less than significant impacts for NEPA but all alternatives except for Alternative 13v would exceed applicable state localized significance thresholds under CEQA. Air quality parameters are expected to return to pre-project levels upon completion of construction. Various comments from agencies and the public also noted the potential for beneficial impacts to air quality from the constructed project. In addition, the Corps is coordinating with the South Coast Air Quality Management District, which recommended consideration of additional measures to further attenuate air emissions during the construction phase.

The comment correctly notes that the Corps identified Alternative 13 as the TSP in the Draft IFR and that the City Council voted to support Alternative 20. In a letter dated April 10, 2014, the City of Los Angeles requested that Alternative 20 be the Recommended Plan. Based on that letter, the Corps requested a policy waiver for the consideration of that alternative as the LPP and Recommended Plan in the Final IFR. By memorandum dated May 27, 2014, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) granted the requested LPP exception and authorized the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report.

8. The Corps disagrees that the study fails to consider feasible, reasonable alternatives. The study undertook a sequenced search for feasible alternatives. Through the formulation and comparison process, alternatives were eliminated for failure to meet the purpose and need and objectives, excessive and unreasonable cost, inconsistency with key project constraints, and similarity to other alternatives included in the reasonable range of alternatives evaluated in detail in the IFR. The Draft IFR includes an extensive discussion of the alternative formulation and comparison process in Chapter 4, in addition to the brief discussion in the Executive Summary cited in your comments. As explained in the IFR, the Corps and City followed a robust process. The Corps, City, other agencies, and stakeholders originally assembled various ecosystem

restoration management measures, the “building blocks” of alternatives, to create 19 alternatives, which were then divided into geomorphic reaches and reassembled to develop 152 different combination plans. As further described in the IFR, most of the initial and many of the recombination plans were infeasible due to their reliance on technically challenging, extensive and expensive engineering interventions, such as the creation of underground detention/retention basins or very large bypass culverts or tunnels. The cost of tunnel construction was estimated to exceed \$1.5 Billion. The plan formulation effort also examined deepening of the entire channel, found to be inconsistent with restoration and to substantially impact utilities and bridges throughout the corridor; and modifications to upstream dams, determined to be too far upstream to significantly affect flow reduction. Without removing high velocity peak flows from the river channel, channel widening is necessary to meet the restoration purpose without violating the major project constraint of maintaining existing levels of flood risk management. The study team considered a conceptual alternative limited to the existing LACDA right of way and found it would not meet the restoration purpose, as high velocity flows would not be reduced sufficient to sustain habitat during high flow events and it would violate the constraint of maintaining existing flood risk management levels. The study also considered the conceptual alternative of channel widening throughout the study area and eliminated it for excessive cost of over \$7.6 Billion for land alone. The combination alternatives were assessed for ecological outputs using the CHAP model and their costs were analyzed as disclosed in the IFR. The Corps uses IWR Plan to assess cost effectiveness and conduct incremental cost analysis. The IWR Plan results included the LATC site starting with Best-Buy Alternative 9 as described further in Chapter 4 of the IFR. Best Buy Alternatives smaller than Alternative 10 were eliminated for failure to meet the purpose and need and objectives, as they did not include restoration in all reaches and failed to restore habitat connectivity throughout the study area and to regionally significant ecological areas. Real estate considerations, including impacts to commercial facilities, businesses, and residences, were a major area of investigation for the study. Private lands were included only if restoration benefits in that reach could not be accomplished any other way. Opportunities for restoration of a southwestern riparian ecosystem (as opposed to restoration of only riparian plant communities and habitat) are exceedingly rare in the Los Angeles watershed, but are present within the study area at critical opportunity areas at Taylor Yard and LATC.

Although initial plans were developed that excluded the Taylor and LATC parcels, they did not meet the restoration objectives for restored habitat and habitat connectivity. The inclusion of the Taylor Yard and LATC properties provided the only opportunities in the study area to substantially widen the channel and increase habitat to meet project objectives. Corps planners and reviewers searched extensively for sites that would meet the project needs to ensure the “hard look” required by NEPA. The river banks are flanked by freeways, major utility corridors, and rail lines in most portions of the study area. In addition, residential communities occupy other parcels close to the river’s banks. As the comment letter notes, the LATC is the largest single-owner property adjacent to the Los Angeles River. Even if technically feasible, to obtain land similar in size to the LATC along the river would require uprooting entire neighborhoods.

Therefore, no alternatives excluding LATC were identified that meet the purpose and need and project objectives, as discussed in the Draft IFR. Alternatives must meet the needs the federal action is intended to serve. *Environmental Defense Fund v. U.S. Army Corps of Engineers*, 492 F.2d 1123 (5th Cir. 1974); see also *City of Angoon v. Hodel*, 803 F.2d 1016, 1021 (9th Cir.

1976) (“When the purpose [of a project] is to accomplish one thing, it makes no sense to consider the alternative ways by which another thing might be achieved.”) The alternatives presented for detailed consideration constitute a reasonable range of alternatives as required by NEPA. Union Pacific does not identify any reasonable, feasible alternatives meeting the purpose and need that the Corps failed to consider. As noted above, following public review, further detailed cost analysis was performed, which identified a more cost effective variation on Alternative 13. Alternative 13v is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This variation is identified as the NER plan in the Final IFR. This variation is within the spectrum of alternatives analyzed in the Draft IFR, as discussed in Section 4 of this Final IFR.

9. Unrealistic assumptions: Union Pacific’s position of the inclusion of the LATC site in a proposed project is noted. However, we disagree that the existing rail yard location is the only possible site in the greater Los Angeles region where such a rail yard is feasible. The Corps further disagrees that the mere assertion that no suitable site is available is substantial evidence of its accuracy. The analysis in the IFR is based on available information, and Union Pacific has not provided factual information to contradict the analysis.

We agree that NEPA requires a “full and fair discussion of significant environmental impacts” as part of an EIS, including direct and indirect impacts. The impacts of including the LATC site in the project alternatives are analyzed in sufficient detail in the IFR. The impact analysis considers direct, indirect, and cumulative impacts. The provision of LERRD, including the LATC site, is a sponsor responsibility. The ecosystem restoration project would not prescribe a specific location for the LATC functions. The analysis does conclude that the impacts from conversion of industrial land at LATC would be significant and adverse with respect to land use. The Corps acknowledges and describes this impact in the report. The Corps believes that the assumption that LATC functions can be transferred to another location within the Los Angeles region is supported. The Los Angeles region is large. The analysis assumes that the LATC function would still be needed within the greater Los Angeles region, whether established at a new site or co-located at an expanded alternative facility. The Basin has several rail yards, and new or expanded rail yards have been proposed in the last decade. The City is experienced with complex real estate transactions and facility siting considerations. The analysis in the IFR assumes that the LATC functions would be reestablished in an industrial zone, of which Los Angeles County alone has 17,922 acres of such zoning. The IFR will clarify the indirect impacts associated with relocating the LATC’s industrial use within an industrial zone within the Greater Los Angeles region; additional CEQA analysis would analyze site-specific impacts associated with a specific relocation scenario at the appropriate time.

10. In fact, Union Pacific’s comment letter acknowledges that an alternative site could be identified and expresses concern over a permitting and construction time frame. The Corps recognizes that Union Pacific’s relocation to a new site could take time. The Corps and City of Los Angeles will develop a construction sequencing schedule that takes into account the logistical issues identified.

11. See Response 7 above.

12. Site screening: We appreciate your concerns regarding site screening. The discussion included in Appendix H briefly describes the reasons various sites were dismissed from further

consideration. As you note, some sites were identified as posing particular challenges in relocation of services. However, we disagree that the LATC site should be treated similarly to these sites. As noted in the IFR, private sites were excluded except when critical to meeting study objectives. The CSY site identified as having comparable circumstances is only 25 acres. Moreover, the functions at that site serve the immediate area. By contrast, the LATC site is one of only two large single owner parcels in the historic floodplain adjacent to the river. As further discussed in the IFR, under Corps policy, sites with known or suspected HTRW contamination are to be avoided whenever practicable to do so. However, in this case, the Corps determined avoidance was impracticable because of the substantial constraints within the study area. As discussed above, the Corps searched diligently for other sites that would meet the need, but no other site provides the same restoration potential at the downstream end of the project. The inclusion of the LATC site provides the only opportunity within the study area to remove concrete from the bottom of the river channel. Agencies, stakeholders and the public overwhelmingly supported Alternative 20, often specifying that the hydrologic and hydraulic reconnection of the river to the LATC site was critical to the project objectives and effective river restoration. We appreciate your concern that a site of appropriate size and proximity be identified for the replacement of LATC operations. The City of Los Angeles has expressed its continued commitment to work with you on the resolution of site identification and a negotiated transaction for site acquisition.

13. Comments on the Draft IFR are addressed in the Comment Appendix of the Final IFR.

14. Opposition to project and request for recirculation of Draft IFR: The Corps and the City do not agree that recirculation or supplementation of the Draft IFR is required at this time. Under NEPA, an agency shall respond to all comments submitted in the Final EIS, discussing at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised. 40 CFR 1502.9(b). A supplement to a draft EIS is to be prepared when the agency makes substantial changes in the proposed action that are relevant to environmental concerns, or there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. 40 CFR 1502.9. Neither of these circumstances is present here. Our responses to your comments address your views, but no significant new circumstances or information has been identified, nor does the Corps plan to make substantial changes to the proposed actions addressed by the Draft IFR in the Final IFR that are relevant to environmental concerns. The discussion of effects related to the LATC site will be clarified, but no substantial new information has been identified. We appreciate your input on the Los Angeles River Ecosystem Restoration Feasibility Study. As requested, your comments have been shared with decision-making bodies of both the Corps and City and will be included in the Final IFR submitted to the Chief of Engineers.

### **Union Pacific Railroad 2<sup>nd</sup> Letter**

Thank you for your letter regarding the Los Angeles River Ecosystem Restoration Feasibility Study. Your comments are noted. We appreciate your acknowledgement of your long history of cooperation with the City of Los Angeles and acknowledgement that a sale or exchange with the City could be reached in the future for a site that is compatible with the use and needs associated with the existing site. As you know, the ecosystem restoration project would be implemented in phases over time, dependent on appropriations, construction scheduling and other considerations. The City has an established reputation of working effectively with railroads. We appreciate your

willingness to continue dialogue with the City to meet the purpose of the restoration study and Union Pacific's own needs.

### **Urban Rivers Institute**

See GR-A.

### **Urban Waters Federal Partnership**

1. Opportunities for complementary projects in the future remain a viable avenue for the City to continue to explore as resources allow if funding sources other than the Corps become available. If the City were interested in exploring expanded opportunities in and along the River beyond the recommended plan, this could be pursued through the Section 408 modifications to completed projects permitting process.
2. See GR-A.
3. The Corps recognizes that real estate costs are significantly higher within the Los Angeles area relative to other parts of the country. In recognition of those costs, the City offered to voluntarily waive reimbursement of the costs of lands, easements, rights of way, relocations, and disposal sites exceeding its statutory share of total ecosystem restoration costs. While all of the plans in the Final Array are Best Buy Plans, and are, therefore, effective and efficient, Alternative 13 was identified in the Draft IFR as more efficient than Alternative 20 in providing ecosystem outputs. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Following public review, a more detailed cost analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as "Alternative 13v" for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

4. It is recognized that Alternative 20, as the largest of the final array of plans, will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment. As noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan.

5. With an updated cost of \$694 million, the NER Plan (Alternative 13v) represents a very significant investment in ecosystem restoration along the LA River, and also generates substantial habitat and connectivity benefits. However, as noted above, the Corps is recommending Alternative 20 as the Locally Preferred Plan, in recognition of the additional benefits provided by this plan.

6. In addition to the ecosystem restoration plan, a complementary recreation plan is also included. This will allow the public to access and appreciate the restoration project without negatively impacting restoration outputs.

## **USC School of Architecture, Landscape Architecture**

See GR-A and GR-B.

## **USC School of Architecture, Landscape Morphologies Lab**

1. See GR-A.

2. See GR-B.

3. Alternative 10 is the least cost of the four alternatives in the final array, and minimally meets the planning objectives. As shown in Table 6-4 it provides a minor improvement to nodal (local) connectivity. Therefore, the incremental increases in nodal (local) connectivity beyond that alternative were displayed in the report for comparison.

4. The feasibility study evaluated a range of restoration alternatives. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Following public review, further analysis was performed that included a more detailed cost analysis using Mii software, real estate cost updates, and further modified contingencies based upon a full cost risk summary analysis. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. This



alternative is within the spectrum of alternatives considered in the Draft IFR. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

Alternative 13v provides the greatest amount of ecosystem restoration output for the investment cost; in other words, for the total project cost of \$694 million, there is no other plan of similar cost that produces more restoration output. Therefore, Alternative 13v is identified as the NER Plan. However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan. The Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final Integrated Feasibility Report and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public.

5. Thank you for the information; a similar analysis of connectivity has been conducted and is included in the Final IFR.

### **Valley Industry & Commerce Association**

1. See GR-A.
2. The recommended plan will involve the conversion of some lands that are currently zoned industrial to accommodate the project's ecosystem use. This activity is a responsibility of the non-Federal sponsor (City of Los Angeles), which must provide all lands for the project. The City of Los Angeles will work closely with any business that needs to be relocated as a result of the project to relocate within the region, per the requirements of the Uniform Relocation Act. Preservation of industrial land is a priority of the City as expressed in its industrial land use policies; therefore, this will be considered by the City as the project moves forward.
3. This is an important issue throughout the Los Angeles Watershed; however, the issues of recycled water, increased capture, and use of stormwater are outside of the scope of Corps ecosystem restoration. It is the City's desire to use recycled water, when feasible for construction and maintenance of the completed project to support habitat.
4. Preferences for funding are noted.

### **Walk Bike Glendale**

See GR-A.

## **Wild Heritage Planners**

See GR-A.

## ***Petitions***

### **Restore the LA River Petition**

See GR-A.

### **LA River Revitalization Corporation Petition**

See GR-A.

### **St. Sebastian Catholic Church Petition**

See GR-A.

## **Individuals**

### **Agner, Herb**

See GR-A.

### **Aguilera-Gonzalez, Emiliana**

1. Wildlife, including coyote, bobcat, and mountain lion currently reside in Griffith Park and often make their way to the river. For this reason, the alternatives were designed with the intent of enhancing their movement through (rather than to) urban LA, as opposed to the existing condition where they may enter the river with no outlet or corridor to adjacent wilderness areas, prompting them to enter local neighborhoods. The wildlife connectivity measure you reference was considered as a means to allow existing mammals to safely transit the area. This measure was evaluated and found in many cases not to be effective. However, the restoration design will include slopes and vegetation suitable for wildlife passage. Only by improving connectivity along the river through the use of wildlife tunnels/bridges and other such methods, can safety for wildlife be enhanced by providing a means to get to other natural areas through enhanced corridors and habitat nodes.

While turf reinforcement mats are currently considered for erosion control, specific designs will be determined during the detailed design phase prior to construction. The Corps will continue to evaluate options for erosion control to minimize impacts to wildlife.

2. The Corps would cut a slot into an existing drain so all flow up to a certain amount would now flow through the slot into a wetland area. If the water level continued to rise, it would exceed the height of the slot and flow into the river as it did before. The diversion will be effective whenever there is flow in the storm drain, which will include urban runoff.

3. There are a number of excellent references on the history of the Los Angeles River which provide the thought processes that went into the design for the Los Angeles River channel. The design process for the Corps has progressed over time, and we now strive to include ecosystem restoration features into our projects. Fencing has a negative impact on wildlife migration so the

intent is to limit it as much as possible. However, there are some adjacent uses that may still require fencing. The Corps will also incorporate appropriate fencing wherever safety is paramount.

4. Thank you for your comment. The Los Angeles River is still the primary feature in the flood risk management for the City of Los Angeles. One of our main constraints is that proposals cannot affect the current level of protection afforded by the channel.

**Alas, Kevin**

See GR-A.

**Alexander, Peter**

See GR-A.

**Alpern, EstherLee**

The authority under which the study is being conducted is for ecosystem restoration. That Corps authority allows for integration of passive recreation features, such as multi-purpose trails, where they do not conflict with restoration. Active recreation elements, such as ball fields, are not compatible with restoration and are beyond the scope of an ecosystem restoration project.

**Amsden, Liz**

See GR-A.

**Anderson, Carolyn**

See GR-A.

**Anderson, Michael S.**

1. Comment noted; this task force was a precursor to the LARRMP. We will add a reference to this task force in the earlier reports section.
2. Comment noted. A more recent multiple objective feasibility study was completed for Taylor Yard in 2002. Taylor Yard studies were examined and documented as part of the planning process in Section 1.4 of the main IFR.
3. As an ecosystem restoration project, this project is not formulated for flood risk management improvements. Although some increase in flood storage may occur due to excavation of substrate, this result is incidental to the overall goals and objectives of the study.
4. The study you refer to focused on using the entire Taylor Yard site as a detention basin with incidental ecosystem enhancement and recreation. The area at Taylor Yard is not large enough to provide significant flood relief for the entire lower Los Angeles River. The goal of the Taylor study was to reduce peak flows and provide some flood risk benefits as far downstream as possible. Since that time, portions of Taylor Yard have been sold and are in use for alternate purposes including the Rio de Los Angeles State Park and a school, along with private development. As part of the current ecosystem restoration study, we looked for opportunities for

peak flow reduction in concert with restoration. The parcels of Taylor Yard we included in our study may still offer some lesser incidental peak flow reduction, but it will not be on the order of what could have been achieved using the entire Taylor Yard.

**Antos, Mike**

See GR-A.

**Appleton, Steven**

1. Public coordination occurs throughout the NEPA/CEQA process and through some permitting processes. Continued opportunities for public input will be offered as the project moves forward.
2. Construction phasing will be dependent on several factors including those mentioned in the comment.
3. Your comment noted several different proposals for site specific projects; we agree that some of these proposals may be outside the scope of this study but could be implemented by others in the future. In regards to your recommendations pertaining to acquisition of the "Bimbo Bakery Parcel," greening of Blimp Street, and tunnel or bridge connections to Elysian Park, the acquisition of properties only for recreation is beyond the authority of the Corps for a restoration project, and any recreation elements must be on lands acquired for the restoration. A pedestrian/wildlife bridge between the river channel and Elysian Park is a creative idea; however, it may not be used by wildlife due to exposure and size of the structure. A bridge of sufficient size would likely be impracticable.
4. Fencing will be designed in accordance with Corps and sponsor safety requirements, and in consideration of aesthetic values as well as wildlife movement. The non-Federal sponsor would have an opportunity to select (and provide additional funding for) fencing materials or designs that exceed Corps standards. For the feasibility study, it was assumed that existing chain link fencing that occurs in several locations along the study area would be replaced in kind. However, modifications may be made during the design phase.
5. The recreational plan as proposed will allow connection and trails and will try to maximize public access without detracting from the ecosystem restoration outputs of the project to the extent it does not conflict with the ecosystem restoration outputs and function of the project. Accessibility needs differ between flood risk management facilities and recreational sites; final design plans will include evaluation of best safety measures for protection of facilities and access to recreation. Safe and compatible access will be considered as detailed design is completed. Assuming you were referring to Executive Order 12898 (Environmental Justice), the recreation plan includes trails and access points along the river.
6. Recreational features that fall within the footprint of this project and which are affected by the project or where use patterns are affected by the project will be constructed or repaired in compliance with applicable building codes and health and safety regulations.
7. Widening of channel walls in some reaches to increase the channel width and allow additional habitat in the channel was included in some of the alternatives considered; where a vertical wall is used, it is typically used only on one side of the channel at a time. However, you are correct that the sentence referring to Reach 6 on page 67 of the Design Appendix is a typographical error, and it will be corrected.
8. Concur. It should be referencing the Taylor Yard section, not the West bank.

9. Thank you for reporting your observation. Hydraulic modeling and detailed design will consider sediment transport and possible impacts to restored areas. More detailed designs to be completed in the Preconstruction Engineering and Design phase will identify if there are springs within Taylor Yard that are viable for providing project water.
10. Wetland restoration will be completed with vector control in mind, and necessary coordination will occur during design, implementation and operation.
11. Noted.

**Aronson, Robert**

See GR-A.

**Babila, Phyllis**

See GR-A.

**Bander, Falcia**

In terms of modifying the river banks to allow public access, presumably this relates to a desire for public access to the river for recreation purposes. The recommended plan includes a recreation plan that complements the ecosystem restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function, preventing recreation visitation adversely impacting the restored areas. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

**Banner, Michael**

See GR-A.

**Barden, Lane**

See GR-A.

**Barker, Urte**

See GR-A.

**Barnett, Geoff**

See GR-A.

**Barngrove, Sally**

This feasibility study is evaluating ecosystem restoration alternatives in and along an 11-mile stretch of the Los Angeles River from Griffith Park to downtown Los Angeles. None of the alternatives evaluated included features in the vicinity of Devil's Gate Dam.

**Baron, Vic**

See GR-A.

**Barretto, Brandon**

See GR-A.

**Bartrosouf, Alek**

See GR-A.

**Bates, Russell**

See GR-A.

**Battin, Susanna**

See GR-A.

**Belden, Edward**

See GR-A.

**Benoit, Jay**

See GR-A.

**Bevilacqua, Anthony**

See GR-A.

**Bilson, Renne**

See GR-A.

**Bise, Ava**

See GR-A.

**Bossone, Lynn**

See GR-A.

**Bouville, Fabienne**

See GR-A.

**Bowers, Paul**

See GR-A.

**Bowling, William**

See GR-A.

**Brenner, Maya**

See GR-A.

**Brotman, Daniel**

See GR-A.

**Brown, Lynn**

See GR-A.

**Brown, Syd**

See GR-A.

**Brye, Steve**

The commenter correctly assumes that the study alternatives do not involve restoration of the entire LATC parcel. No assumptions are made regarding the most appropriate use of the other portions of the parcel not included in the project. The suggestion to utilize such lands for a higher education institution/purposes is noted.

**Budzik, Mike**

See GR-A.

**Cabrera, Mirella**

See GR-A.

**Camacho, Maria**

See GR-A.

**Campbell, Alice**

Thank you for your comment. The proposed project alternatives are for the purposes of restoration, not beautification. The appendix cited is consistent with the main IFR document and evaluates the hydrologic and hydraulic conditions and impacts of the project alternatives. The maintenance of existing flood risk management function is a major constraint of the restoration formulation, so it is discussed throughout the study documents. The Corps of Engineers and the City of Los Angeles are aware of the flood risks near the area to which you are referring. In fact, in 1992, the Corps of Engineers performed a flood risk reevaluation study for the entire Los Angeles County Drainage Area (LACDA) to consider changed conditions. The study resulted in channel improvements, consisting primarily of floodwalls along the lower Los Angeles River and the Rio Hondo Diversion Channel. Although the 1992 report identified the potential flood conditions along the upper Los Angeles River, no improvements to the upper Los Angeles River, including the ARBOR reach, were economically justified at that time. Flood risk management is not within the scope of the current Ecosystem Restoration Feasibility Study.

The City of Los Angeles is in the process of requesting a LOMR (letter of map revision) to FEMA that would identify the flood risks and flood zones along the Los Angeles River. That effort should be complete before any construction has begun for the current Ecosystem Restoration study. A major constraint of the current Ecosystem Restoration study is that the proposed features will not have an adverse impact on the level of protection currently afforded by the Los Angeles River channel.

Contamination on lands to be included in the restoration project would, as described in the IFR, be remediated prior to project construction. The costs of the remediation would be at 100% non-project cost. The City is responsible for ensuring the remediation of the lands to support the ecosystem restoration features. Where groundwater contamination is present and would be encountered during construction, the City shall ensure the proper handling, treatment and disposal of the contaminated groundwater at 100% non project cost.

Recreation is a minor component of the proposed project alternatives, constituting less than 1 percent of total project cost.

**Camphuis, Kay**

See GR-A.



**Carpenter, Cathy**

See GR-A.

**Carrillo, Juliette**

See GR-A.

**Casillano, Matthew**

See GR-A.

**Chauser, Lee**

Thank you for your comment.

**Chesler, Stewart**

Comment Noted. The array of alternatives in the Draft IFR included Alternatives 10, 13, 16 and 20; as noted elsewhere, a more cost effective variation on Alternative 13, utilizing the Reach 7 plan from Alternative 20, was identified through subsequent cost analysis. Alternatives smaller than Alternative 10 were dismissed from further consideration for failure to meet the project purpose and objectives. The LATC site is one of only two large single-owner parcels available along the river corridor within the study area where substantial river widening can occur.

**Colacion, Edward**

See GR-A.

**Conway, Rebecca**

See GR-A.

**Crane, Rebecca**

See GR-A.

**Cruz, Ray**

Thank you for your comment. An aerial tramway is outside the scope of the feasibility study and the Corps mission for ecosystem restoration.

**Dawson, Robert**

See GR-A.

**de Zamaroczy, Nicolas**

See GR-A.

**de Zamaroczy, Nicolas**

See GR-A.

**Deptula, Anthony**

See GR-A.

**Deutsch, Lauren**

See GR-A.

**Devereaux, Toni**

See GR-A.

**Dillard, Joyce**

1. The Corps of Engineers and the City of Los Angeles are aware of the flood risks along the Los Angeles River. In fact, a 1992 study by the Corps of Engineers identified the floodplains for all areas along the Los Angeles River. A major constraint of the current Ecosystem Restoration study is that the proposed features will not have an adverse impact on the level of protection currently afforded by the Los Angeles River channel. As such, any modifications to the channel will entail detailed engineering analyses to ensure the project will not adversely impact channel capacity or structural stability of the existing channel. The selected plan will not increase flood risks nor residual flood risks for all reaches of the Los Angeles River.
2. We do not concur that recreation and flood risk management are inherently incompatible. Final design plans will include necessary safety measures to ensure continued protection of the public and flood risk management facilities, while providing reasonable access for compatible passive recreation.
3. Dates will be investigated and corrected if necessary.
4. Comment on the LARRMP noted.
5. Thank you for your investigation of this Study. The additional projects mentioned will be added to the cumulative impacts analysis as appropriate.
6. The ecosystem restoration study has been developed with the understanding of numerous constraints that are present in an urban environment.
7. Evaluating the potential effects of any such developments (which are not currently proposed) on ecosystem restoration would be the responsibility of those project proponents.
8. Although Repetto Hills and Ascot Hills were not specifically mentioned in the IFR, the proximity of adjacent undeveloped or open space areas was determined to be a key benefit as the project will allow greater access to and from these areas. Ecosystem restoration for wildlife values is the primary objective of this project. Compatible recreation elements are a secondary objective. With or without a "Significant Ecological Area" designation, the project area would

not be a “front for development,” as any future proposals within its boundaries would need to be compatible with restoration objectives.

9. Cost estimates have been developed using the best available data, and reflect the best estimates that can be made at the current level of design.

10. Contamination on lands to be included in the restoration project would, as described in the IFR, be remediated prior to project construction. The costs of the remediation would be at 100% non-project cost. The City is responsible for ensuring the remediation of the lands to support the ecosystem restoration features. Where groundwater contamination is present and would be encountered during construction, the City shall ensure the proper handling, treatment and disposal of the contaminated groundwater at 100% non project cost.

11. No claims are made that this project alone would result in sustainable economic development for the region, although it is anticipated that visitors and recreation trail users (as well as construction) would provide some economic lift.

12. The Corps identified Alternative 13 in the Draft IFR as the NER plan. As noted elsewhere, a more cost effective variation on Alternative 13 (Alternative 13v), utilizing the Reach 7 plan from Alternative 20, was identified through subsequent cost analysis.

See GR-A.

13. The alternatives have been designed to be primarily self-sustaining, within the available and anticipated water budget. Maintenance that is required (such as removal of non-native vegetation as well as mosquito abatement, if required) has been identified and accounted for in project cost estimates, and the non-Federal sponsor has agreed to take on that responsibility.

14. All local cities and agencies, as well as the general public, have been made aware of the proposed project, and received a copy of the Draft IFR.

15. A Health Impact Assessment has been included as part of the Final IFR in Section 5.11.3. The HIA did not identify any unmitigable effects to public health and safety arising from the proposed project.

16. Public health and safety remain a paramount concern of the U.S. Army Corps of Engineers and the City of Los Angeles.

17. The IFR describes the estimated project costs. Future appropriations will be required to fund the implementation.

**Dillon, Raquel**

See GR-A.

**Din, Stephanie**

See GR-A.

**Dragert, Tobi**

See GR-A.

**Egeler, David**

See GR-A.

**Epstein, Scott**

See GR-A.

**Erasmus, Rocio**

See GR-A.

**Ferrufino, Chantelly**

See GR-A.

**Field, Corey**

See GR-A.

**Fine, Jocelyne and Steve**

See GR-A.

**Ford, Chris**

See GR-A.

**Forster, Peggy**

See GR-A.

**Fourier, Jason**

See GR-A.

**Franco, Veronica**

See GR-A.

**Freilich, Lawrence**

See GR-A.

**Frimmer, Justin**

1. See GR-A.
2. The Los Angeles River and associated structures provide a necessary flood risk management function for all communities within its watershed. Simply tearing out all of the concrete without adding a suitable area for flood water conveyance is not an acceptable alternative and acquiring land is extremely expensive. Significant water flows in the river only during storms. The rest of the year, the flow of water in the river is dominated by releases from Tillman Treatment Plant.

The study seeks to restore natural processes and functions within existing constraints, including maintaining existing levels of flood risk management.

**Frye, Lauren Lajoie**

1. Thank you for your letter. The initial study area included 32 miles of the river within the City. The study process resulted in narrowing that area to the ARBOR reaches described in section 1.2.1 of the IFR. Further studies could address other areas within the watershed, however, that is beyond the scope of this study.
2. Restoration opportunities throughout the entire 32 miles of the LA River within the City of Los Angeles were evaluated and, during the preliminary analysis phase, choices were made to focus on areas that could be most easily connected to the river's most extensive existing riparian habitat corridor—the 11-mile Glendale Narrows stretch. Other areas were deemed infeasible, because of infrastructure barriers, including the Sepulveda Dam, narrow all-concrete box channel configuration of the channel through Studio City, all-concrete character of the channel upstream of the Basin and because the Basin itself already hosts rich riparian habitat with nearby large multi-purpose open spaces, including the Sepulveda Basin Wildlife Refuge. Additionally, the scope of the study had to be limited, because it was not feasible to cover so much territory with the available resources. Restoration, runoff management, and peak flow reduction in the river's watershed will be important to LA River restoration, but the detailed strategy planning must be addressed by other complementary efforts.
3. The Blue Boulevards concept you propose is in line with identified goals of the City of Los Angeles for stormwater capture, treatment, and beneficial reuse of runoff. The alterations you suggest fall outside of the jurisdiction of the Corps and purpose of this feasibility study.

**Funaro, Charles**

See GR-A.

**Gallardo, Ruth**

1. See GR-A.
2. See GR-B.

**Garlington, Todd**

See GR-A.

**Garrison, Elizabeth**

See GR-A.

**Gedeon, Geza**

Thank you for your comments. The Corps appreciates your desire to reach the general public, to allow them to learn the distinctions among the various, complex alternatives, and to make more informed comments. The Corps and City of Los Angeles made the IFR document publicly

available on the Corps' website on Friday, September 13, 2013, and delivered copies of the document to libraries and agencies by September 20, 2013, noting a close to the public comment period on Tuesday, November 5, 2013 (45 days from September 20). The availability of the document was heavily publicized through news releases and press reports, and the Corps began to receive comments almost immediately. The Notice of Availability (NOA) was published in the Federal Register on October 4, 2013, which extended the public comment period an additional 2 weeks to Monday, November 18, 2013. By November 18, the document was available to the public for review and comment for over 9 weeks. Due to extremely tight project deadlines, the Corps was not able to grant an extension beyond the end of Public Review on Monday, November 18, 2013. The public will have an additional opportunity to comment on the Final IFR during a 30-day review period. Thank you for the information on the neighborhood councils.

**Gill, Jennifer**

See GR-A.

**Giroux, Helen**

See GR-A.

**Gleason, Patricia**

See GR-A.

**Gomez, Horacio**

1. See GR-A.
2. While benefits such as enhancing public accessibility and creating green spaces are important, they are not the primary purpose of the project. The primary purpose of the project is ecosystem restoration. The recreation plan complements the restoration plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. Subsequently, a decision was made to support the recommendation of Alternative 20 as the Locally Preferred Plan. The recreation plan was adjusted to be compatible with the ecosystem restoration features included in Alternative 20. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite. The IFR recognizes the various social benefits, including providing recreational resources to lower income and minority population, public health, and community connectivity.

**Gonzalez, Jay**

See GR-A.

**Goodman, Howard**

See GR-A.

**Gray, Evelyn**

See GR-A.

**Griffin, Linda**

1. See GR-A.
2. This study is the Los Angeles River Ecosystem Restoration Feasibility Study and not the LA River Revitalization Master Plan, which is a City of Los Angeles plan.

**Haagenson, Kathleen**

See GR-A.

**Hall, C. Andrew**

See GR-A.

**Hanna, Mark, PhD, PE**

Water quality improvement is considered an ancillary problem/opportunity and is not an objective of the Study. It was considered as an objective initially because of public concerns about the River's poor water quality, but was not carried forward for several reasons. While water quality improvement objectives would be focused on improvement for aquatic organisms and restoration purposes (not human use or consumption), the existing riparian and freshwater marsh habitats and the associated wildlife have been sustained and are viable under the current water quality conditions. Certain measures evaluated in the study will incidentally improve water quality through natural processes such as 1) increased acreage of riparian and freshwater marsh, 2) daylighting storm drains and planting wetlands at their confluences, and 3) creating side channels that remove water from the River, direct it through created wetland and riparian areas, and return this naturally treated water to the River. While it is recognized that water supply is an important issue in Southern California water conservation, recharge and similar efforts are beyond the scope of this study. Incidental recharge benefits may occur with restoration but are not quantified.

**Hardin, Cindy**

See GR-A.

**Hatrick, Adrienne**

See GR-A.

**Hauck, Adam**

See GR-A.

**Hays, Sarah**

See GR-A.

**Hedge, Joanne**

See GR-A.

**Hernandez, Eugene**

Comment Noted.

**Hess, Peter and Marguerite**

See GR-A.

**Hidalgo, Kimberly**

See GR-A.

**Hildebrand, Charlotte**

See GR-A.

**Hopkins, Alexandra**

See GR-A.

**Horne, Mark**

See GR-A.

**Hough, Jessica**

See GR-A.

**Hrenda, Cathy**

See GR-A.



**Hudnut, Alec**

See GR-A.

**Husseini, Salah**

See GR-A.

**Hutchins, Michele**

See GR-A.

**Hutson, Clifford**

See GR-A.

**Jackson, Malcolm**

See GR-A.

**Javier, Linda**

See GR-A.

**Jessler, Darynne**

See GR-A.

**Jocoy, Christine**

See GR-A.

**Juergens, Kate**

See GR-A.

**Kammerer, Carolyn**

See GR-A.

**Kaplan, Fred**

See GR-A.

**Kapoor, Daveed**

See GR-A.

**Kasperkovitz, Chrisian**

See GR-A.

**Kaye, Dessa**

See GR-A.

**Keiner, Scott**

See GR-A.

**Kelley, Celeste**

See GR-A.

**Kirschbaum, Saran**

See GR-A.

**Klengler, Joan and Inglof**

See GR-A.

**Kugelman, Francie**

See GR-A.

**Kuppers, Fred and Sheri**

See GR-A.

**Lamm, Jim**

See GR-A.

**Lange, Trent**

See GR-A.

**LaValley, Tim**

See GR-A.

**LeBoeuf, Elaine**

See GR-A.

**Legras, Larry (and family)**

See GR-A.

**Lerner, Erik**

1. See GR-A.
2. The recommended plan includes a recreation plan that complements the restoration features. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function, preventing recreation visitation from adversely impacting the restored areas. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

**Lester, Ely**

See GR-A.

**Lindsey, Philippe**

See GR-A.

**Lizama, Dalma**

See GR-A.

**Lloyd, Grace**

See GR-A.

**Lundy, Ian**

See GR-A.

**MacAdams, John**

See GR-A.

**Magali**

See GR-A.

**Marks, Marilyn**

See GR-A.

**Mather, Evan**

See GR-A.

**Mayreis, Rex**

See GR-A.

**Mazzoleni, Ilaria**

See GR-A.

**McCain, Brain**

See GR-A.

**McCreary, Diane**

Thank you for your comment. The Corps of Engineers and the City of Los Angeles are aware of the flood risks near the area you are referring to. In fact, a 1992 study by the Corps of Engineers identified the 1% annual chance exceedance floodplain for all areas along the Los Angeles River. A major constraint of the current Ecosystem Restoration study is that the proposed features will not have an adverse impact on the level of protection currently afforded by the Los Angeles River channel. The upstream limit for the current project is near Bette Davis Park just east of the Warner Brothers Studio lot. It will not have any impact on the Los Angeles River next to your property.

**McQuiston, J.H.**

1. Thank you for your comment. The Corps appreciates the anecdotal evidence provided by the commenter and would encourage documenting as much local knowledge as possible for historic purposes.
2. The Corps of Engineers and the City of Los Angeles are aware of the flood risks along the Los Angeles River. In fact, a 1992 study by the Corps of Engineers identified the floodplains for all areas along the Los Angeles River. A major constraint of the current Ecosystem Restoration study is that the proposed features will not have an adverse impact on the level of protection currently afforded by the Los Angeles River channel. The City of Los Angeles is in the process of requesting a LOMR (letter of map revision) to FEMA that would identify the flood risks and flood zones along the Los Angeles River. That effort should be complete before any construction has begun for the current Ecosystem Restoration study.

3. The Corps understands that a multi-objective project has a high value. During the detailed design phase, the Corps will further evaluate how much vegetation can be allowed in the channel while still maintaining the current level of flood protection.
4. Public safety is addressed in Section 5.12.3 of the report.
5. The Operations and Maintenance plan for the restoration project will include regular maintenance of all the proposed features including maintenance required to address potential effects of increased public access such as dumping, trash, and debris.
6. Local and regional water resources are considered in our water budget for the ecosystem restoration. Water conservation, recharge and similar efforts are beyond the scope of this study.
7. The basis for the study area is described in Sections 1.1.2 and 1.2.1. The alternative analysis considered historic and existing habitat configuration within this reach of the river that included their linkages and connectivity. That alternative analysis is described in detail in chapter 4 of the IFR.
8. Recreation and public access are described in Section 3.9 of the IFR and in Appendix B Economics. There are some large regional parks, such as Griffith Park in the study area. However much of Los Angeles is considered park deficient and has less than 3 acres of park space per 1,000 residents. This includes reaches 7 and 8 of the study area.
9. Your cost concerns are noted.

**Medberry, Mike**

See GR-A.

**Medford, Roberta**

See GR-A.

**Mehta, Michelle**

See GR-A.

**Melchiorre, Marion**

See GR-A.

**Mendelson, Jodie**

See GR-A.

**Menzies, Leila**

See GR-A.

**Mersola, Jr. Michael (PLG Estates)**

See GR-A.

**Milam, Ron**

See GR-A.

**Miller, Blair**

See GR-A.

**Mills, Melissa**

See GR-A.

**Mischke, Gerald**

See GR-A.

**Montealegre, Andrew**

See GR-A.

**Morales, Ashley**

See GR-A.

**Morton, Patricia**

Thank you for your comment. The recommended plan includes a recreation plan that complements the restoration features. The recreation plan features are integrated into the ecosystem restoration plan and designed to avoid impacts to the restored habitat within the river while allowing for passive recreation to occur.

**Moyer, Harlan and Virginia**

See GR-A.

**Myers, Kalisa**

See GR-A.

**Nachtrab, Tom**

See GR-A.

**Nemtzw, David**

See GR-A.

**Ng, Carol**

See GR-A.

**Nicholson, Sonia**

See GR-A.

**O'Brien, Frank**

1. Only those water bodies within the ARBOR area of consideration were included as part of the project area.
2. Noted, the figure was intended to show historic conditions, not specific to all sites.
3. Noted.
4. The CE/ICA analysis was an important component in identifying the best buy plans, the plans in the final array, and the NER plan. However, the CE/ICA was not the only consideration. The NER plan selection specifically considered additional benefits not captured by the CHAP model, including ecosystem benefits relating to nodal (local), hydrologic and regional connectivity associated with adding different plan features. Per Corps policy, regional economic development effects from project construction and post construction redevelopment, other social effects, resource significance, and reasonableness of cost are also considered in plan selection. While it is true that it is not possible to fully evaluate and capture all plan benefits and costs in our analysis, we believe that the analysis reasonably captures the primary benefits and costs necessary to support the identification of the NER Plan. The NER plan in the Final IFR is Alternative 13v and reflects further detailed cost analysis performed following public review. Alternative 13v replaces the Reach 7 plan in Alternative 13 with the Reach 7 plan from Alternative 20 and is a more cost effective plan than Alternative 13. The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan. However, in recognition of the additional benefits provided by Alternative 20 and strong support by federal, state and local agencies as well as various stakeholders and the general public, the Corps is recommending Alternative 20 as the Locally Preferred Plan.
5. Comment noted. Numerous alternative components were considered which were within the scope and purview of the Corps.
6. The analysis captured benefits of the alternatives either with the CHAP model, or through quantitative and qualitative assessment of connectivity. We feel that we have captured most of the benefits provided by the alternatives.
7. See GR-A.
8. Due to the complexity involved, it would not be possible to capture all of the potential ecosystem benefits in a single model. The CHAP model used for this study assessed habitat

restoration output within the project area. Also, as noted above, the evaluation and comparison of the final array of alternatives and identification of the NER Plan factored in considerations outside the immediate project area, most notably the regional connectivity benefits associated with implementing restoration in key areas. In addition to efficiency, which is measured by the CE/ICA analysis, the recommended plan identification also factored in plan effectiveness, completeness and acceptability, in accordance with Corps planning regulations.

**Ocas, Beverly**

See GR-A.

**Olson, Carl**

Thank you for your comment. Water conservation efforts are outside the scope of this study.

**Olson, Eraina**

See GR-A.

**O'Neill, William**

See GR-A.

**Oswald, Ben**

See GR-A.

**Otto, Harry**

See GR-A.

**Padilla, S. David**

See GR-A.

**Paravecchio, Robin**

See GR-A.

**Pardinas, Ilka Erren**

See GR-A.

**Paredes, Daniel**

1. See GR-A.



2. Although we cannot include your requested recommendations on local hires as a commitment in our feasibility report, it is anticipated that the local professional and skilled labor force will be eligible for the design and implementation of the project through competitive selection.

**Parke, Andrew**

See GR-A.

**Pearce, Richard**

See GR-A.

**Pedersen, Karen**

See GR-A.

**Perez, Gladys**

See GR-A.

**Petteway, Susan**

See GR-A.

**Phan, Marjorie**

Addressing local and regional transportation is beyond the scope of the Corps Authority. However, local and regional transportation projects and planning efforts that will connect or potentially have an impact on better access to the LA River include the Juan Bautista de Anza National Historic Trail; the existing LA River Bikeway and Greenway System and future plans to expand it along the entire 51 miles of the LA River on both sides (102 miles total of trails and bikeway) through the LA River Greenway 2020 Campaign; the Glendale Riverwalk Project which is currently underway; Union Station Master Plan; both the City of Los Angeles Bike Plan 2010 where the LA River is included in the Green Network, and LA County's Bicycle Master Plan 2012; the City of Los Angeles' General Plan Update, specifically the Mobility Element (formerly the Transportation Element) and the Health and Wellness Chapter, Mobility 2035 Plan where the LA River is identified as an opportunity for bikeway and pedestrian linkages: "The Los Angeles River plays a significant role in Los Angeles' environmental, non-motorized transportation and recreational identity" ([http://planning.lacity.org/Cwd/GnlPln/MobiltyElement/Text/MobilityPlan\\_2035.pdf](http://planning.lacity.org/Cwd/GnlPln/MobiltyElement/Text/MobilityPlan_2035.pdf)).

**Phillips, Grace**

See GR-A.

**Phillips, Shane**

See GR-A.

**Piane, Marge**

See GR-A.

**Pierola, Antonio**

See GR-A.

**Plamondon, Anthony**

See GR-A.

**Pollock, Mikaela**

See GR-A.

**Pryor, Larry**

See GR-A.

**Ragosine, Dorrit**

See GR-A.

**Rahman, Abir**

See GR-A.

**Ramseyer, William**

See GR-A.

**Rand, Jae**

See GR-A.

**Rapp, Eric**

See GR-A.

**Raquedan, Inah**

See GR-A.

**Renaker, Mary**

See GR-A.

**Rene-Weissman, Elaine**

The Corps is aware of the potentially significant features of the Los Angeles River. We will comply with Section 106 of the National Historic Preservation Acts (36 CFR 800). This consultation and review process will involve consultation and coordination with the SHPO, Tribal organizations and individuals, and interested parties. If any cultural resources are found eligible for listing on the NRHP and if those elements will be adversely effected by the project, mitigation measures will be developed and implemented. The development of mitigation measures would include efforts to design features that would blend into the historic setting of the Los Angeles River.

**Rene-Weissman, Elaine**

See GR-A.

**Revkin, Dr. Cheryl**

See GR-A.

**Reyes, Christine**

See GR-A.

**Risemberg, Richard**

See GR-A.

**Rivas, Armando**

See GR-A.

**Rizzo, Christina**

See GR-A.

**Roberts, Buddy**

See GR-A.

**Robin, Lauren**

See GR-A.

**Robinson, Kathleen**

See GR-A.

**Robledo, Damian**

1. See GR-A.
2. While some of the goals of the RIO Plan are outside the scope of this study, the alternatives considered in the IFR are consistent with the RIO as well as the LARRMP.
3. Accessibility needs differ between flood risk management facilities and recreational sites; final design plans will include evaluation of best safety measures for protection of facilities and access to recreation. Safety ramps are included in the plans.
4. The Corps estimates for remediation of contaminants were based on a robust data search and use of best available sources. Inevitably, additional sources of information may be indicated by reviewers, but researchers cannot be aware of all such sources. Estimates reflect a good-faith effort to fully account for all possible contamination and develop realistic costs. The costs of remediation are non-project costs.

As stated in the IFR, the Corps prepared an HTRW survey report for the proposed project as required by Engineering Regulation 1165-2-132 that includes a review of over 100 HTRW sites in the vicinity of the proposed project. The HTRW survey report is presented in Appendix K of the IFR. A search of Geotracker ([www.geotracker.waterboards.ca.gov](http://www.geotracker.waterboards.ca.gov)) was performed on March 26, 2014, to determine if additional information has become available regarding contamination at the sites presenting the highest probability for impacts associated with the project: San Fernando Valley Superfund Site, Taylor Yard sites G1 and G2, and the LATC site. The findings of the Geotracker search were consistent with the analysis presented in the Draft IFR. In addition, Section 5.7.3 of the Draft IFR describes additional measures that would be taken to ensure that known or unanticipated soil or groundwater contamination is identified and addressed properly. The City would undertake all appropriate inquiries prior to land acquisition and would adequately investigate City-owned lands. The City is responsible for ensuring that all lands provided for the project are remediated to the standards required for the uses of the ecosystem restoration project as determined by the local regulator and with input from USACE. The City may undertake the remediation or ensure the remediation is undertaken prior to providing such lands for construction of project features. Prior to providing a parcel for project construction, the City must ensure that it is either shown to be free of contamination through adequate site investigation or that it has been remediated to regulator and USACE satisfaction to the standards necessary to support the ecosystem restoration project. Additionally, the non-Federal sponsor will ensure proper handling, treatment and disposal of any contaminated groundwater encountered during construction, including dewatering activities, at 100 percent non-project cost. These measures are also described in Appendix K.

5. ADA requirements will be integrated into design where necessary, as noted in Section 5.9.1.

**Rock, Dave**

See GR-A.

**Rose, Sara**

See GR-A.

**Rossman, George**

See GR-A.

**Rouge, Robert**

Comment noted.

**Saccacio, Anthony**

See GR-A.

**Sandoval, Barbara**

See GR-A.

**Savage, Kathryn**

See GR-A.

**Scarcelli, Ernest**

Comment noted.

**Schmitt, Marilyn**

See GR-A.

**Shabanian, Victoria**

See GR-A.

**Shipman, Margaret**

See GR-A.

**Shorr, Gil and Herschel**

See GR-A.

**Sinclair, Duncan**

See GR-A.

**Siskind, Nicole**

See GR-A.

**Smith, Jerry**

1. Much of the community has indicated an interest in utilizing the river for additional recreation. Safety design is integrated into all Corps facilities.
2. Safety and security of visitors to the LA River is a serious consideration of the Corps, and all restoration designs will have policy-guided safety measures implemented. Safety issues related to encampments or illegal behavior will continue to be under the purview of local police jurisdictions.
3. Comment noted. As stated in the Cumulative Effects analysis (Section 5.14), "All of the proposed alternatives include efforts to provide additional environmental restoration. These are likely to decrease potential growth, rather than induce growth, since these lands would be converted to open space. The conversion of lands from high density uses to open space may have the effect of decreasing the potential for growth.... Where larger-scale restoration measures are suggested such as at LATC (Piggyback Yard), these measures would convert industrial and rail facilities into restored habitat and remove them from the potential of being developed into higher density commercial or industrial uses or converted into housing developments. Conversely, it is possible that large scale restoration would attract a greater number of residents to the surrounding areas, particularly as a result of the area becoming a desirable place to live due to its proximity to restored open space. "
4. Comment noted.
5. The purpose of this project is ecosystem restoration, not water conservation.

**Squires, Kathy**

We hope you enjoy visiting the LA River. Restoration amenities, however, will likely not be available for some years to come. Implementation of the proposed project would begin after congressional authorization, development of detailed plans and specifications, and land acquisition have taken place, and after necessary funding has been appropriated.

**Stemwedel, Peter**

See GR-A.

**Stephenson, Rhoads**

See GR-A.

**Stilwell, Carl**

See GR-A.

**Stowell, Dan**

See GR-A.

**Strick, Nancy**

The Recommended Plan includes a recreation plan that complements the restoration features. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river, increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite.

Additionally, the restoration of the ARBOR reach may induce participation in additional recreation activities which do not currently exist, or which see low participation levels. These might include activities such as kayaking, wildlife viewing, new areas for bird watching, environmental education, stewardship training, or even visits to the ARBOR reach specifically to view the ecosystem restoration features.

**Sullivan, Dr. Robert**

See GR-A.

**Suntree, Susan**

See GR-A.

**Suri, Chris**

See GR-A.

**Szuhay, Daniel**

See GR-A.

**Taylor, Tony**

Thank you for your comment. Improving water quality is not an objective of this study although it is an incidental benefit. Restoration objectives cannot be fully realized by only improving water quality and removing trash.

**Taylor, Tony (second letter)**

Thank you for your comment.

**Teutsch, Carol**

See GR-A.

**Thomas, Aaron**

See GR-A.

**Thompson, Eddie**

See GR-A.

**Thompson, Kalee**

See GR-A.

**Thorne, David**

See GR-A.

**Thraves, Jill**

See GR-A.

**Thronson, Frances**

The primary purpose of the proposed project and alternatives considered in this study is to restore approximately 11 miles of the Los Angeles River from Griffith Park to Downtown Los Angeles by reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries, its historic floodplain, and the regional habitat zones of the Santa Monica, San Gabriel, and Verdugo mountain ranges while maintaining existing levels of flood risk management.

**Tokash, Jennifer**

See GR-A.

**Tornborg, Kay (Flora Thorton)**

See GR-A.

**Trisolini, Katherine, Associate Professor of Law, Loyola Law School**

1. See GR-A.



2. Policy requires that the Corps consider potential climate change impacts when undertaking long-term planning, setting priorities, and making decisions affecting its resources, programs, policies, and operations. Per this requirement, the IFR has incorporated climate change in the existing conditions chapter in Section 3.2, in the impacts chapter in Sections 5.2 and 5.4, and in the Hydrology and Hydraulics Appendix (E), Section 9. Because it is difficult to quantify resilience of restoration measures to climate change, the Corps intends to design all restoration features with climate change resiliency built in. Because all restoration measures are designed to consider climate change resiliency, and because the nuances between levels of restoration are difficult to quantify, including them in the CHAP would provide little meaningful cost-benefit analysis.

**Umbdenstock, Linda**

See GR-A.

**Unwin, Dr. Stephen**

See GR-A.

**Uribe, Oscar**

See GR-A.

**Valencia, Nestor**

The initial study area included 32 miles of the river within the City. The study process resulted in narrowing that area to the ARBOR reach as explained in the IFR in section 1.2.1. Further studies could address other portions of the watershed; however, that is beyond the scope of the present study.

**Van Hook, Chris**

See GR-A.

**Villasenor, Vernon**

See GR-A.

**Walker, Alissa**

See GR-A.

The Corps is not responsible for water allocation or supply within the river. The City would be responsible for ensuring the provision of water sufficient to support the restoration features. The study includes a water budget in Section 4.14.7.

**Ward, Kay**

See GR-A.

**Warner, Tim**

See GR-A.

**Watts, Chris**

See GR-A.

**Weisman, Sharon and Bill**

See GR-A.

**West, Carolyn & David Petzold**

See GR-A.

**West, Carolyn (second letter)**

Thank you for your comments. Below are responses to your questions:

1. The report refers to the banks of the river looking downstream. The right side would be the South side of the River in that reach.
2. Modifications to the channel in that area under Alternative 20 includes changing the trapezoidal channel wall to a vertical wall in a reach adjacent to the 134. This would widen the bottom of the channel in the reach and additional vegetation would also be added between the river and the 134 and overhanging the river bank.
3. Restoration measures include installation of habitat corridors and planting along the bank of the river in this area. That would include the installation of trees and shrubs.
4. Existing trails will be maintained as they are currently. If they are to be disturbed during construction it will be temporary, and any trails affected will be replaced or repaired. Maps of the recreation plan are found at the end of Chapter 6 of the report.

**West, Carolyn (third letter)**

1. The Draft IFR and technical appendices were made available for public coordination per NEPA regulations. Additional data requests were not supported except through formal coordination with other regulatory agencies. A list of acronyms is available at the beginning of the document. Terms are defined as needed within document.
2. The Draft IFR and technical appendices were made available for public coordination per NEPA regulations, including proper public notification. The IFR was available to the public for comment for approximately 9 weeks.
3. The modification in Reach 2 included in Alternative 20 involves changing the channel configuration from trapezoidal to a vertical wall; right side only (looking downstream). This extends from a point about 1200 feet upstream of Riverside Drive to about 500 feet downstream

from the 5 Freeway. This effectively changes the bottom or bed width from 180 feet wide to about 235 feet wide, to allow additional native habitat to establish in the widened channel. Vegetation would be allowed to grow in the channel only to the extent it does not increase the flood risks. Where a vertical wall is included in plans, it is included on one side only, and appropriate safety measures, including fencing and ramps, would be incorporated in the design.

4. Seasonal non-motorized boating is currently allowed within the non-concrete bottom portion of the river from Fletcher Bridge to upstream of the Riverside Drive crossing, when consistent with the flood risk management project operation and maintenance. That program is managed by the Mountains Recreation and Conservation Authority on behalf of the City of Los Angeles, in consultation with the Corps and the County of Los Angeles.
5. Information on proposed features at Verdugo Wash included in Alternative 20 may be found in Chapter 4 of the Final IFR.
6. All existing and planned activities that overlap with the selected alternative in footprint and timing will undergo coordination to ensure a cohesive design and streamlined construction period.
7. During the construction period, a number of Best Management Practices (BMPs) will be utilized to avoid or reduce the generation of dust. These are listed in Section 5.2.4.
8. The selected alternative is not expected to increase mosquito populations above existing conditions, and operation of the project will include the ongoing monitoring of pest populations and coordination with vector control agencies as needed to provide treatment (Section 5.11.3). Additional language has been added regarding the project's impact on rodent populations (Section 5.11.3).

**West, Carolyn (fourth letter)**

The Corps will continue to coordinate with the City's Recreation & Parks Dept. during the pre-construction engineering and design phase to address any potential issues such as those described in your comment.

**Weston, Janis**

See GR-A.

**Wexman, Todd**

See GR-A.

**White, Lisa**

See GR-A.

**Wilhelm, Nicholas**

See GR-A.

**Wilson, Ed**

See GR-A.

**Wolfe, Kim - lariverannex.com**

Specific requirements/regulations dictate what additional study and approval may be required for future modifications to any authorized project. Future decision makers will utilize all of the information that has already been generated. However, as more time passes, more changes may occur to the baseline condition, such as environmental resources, the economic climate, and possibly laws and regulations. All of these factors would need to be considered in a new study or study update, and would need to be documented in a new or supplemental environmental document. Major changes or additions would require Congressional authorization.

**Wolff, Pat**

See GR-A.

**Wright, Anja Stadelmann**

See GR-A.

**Yonai, John**

See GR-A.

**Young, Jennifer**

1. See GR-A.
2. There are no plans to reclaim water, as the goals and objectives of this project are to restore aquatic and riparian habitat. Some water reclamation may occur as groundwater seepage in soft-bottom areas.

**Zaide, Karen**

See GR-A.

**Zell, Jennifer**

See GR-A.

## **Public Meeting Comments**

**1. Dodge, Marian**

See GR-A.

**2. Lopez, Humberto**

See GR-A.

**3. Friedman, Laura**

See GR-A.

**4. Smith, Kathleen**

See GR-A.

**5. Schnieder, Richard**

See GR-A.

**6. Linton, Joe**

See GR-A.

**7. Williams, Tom**

See GR-A.

**8. Morgetti, Karen**

A. Thank you for your comments. Regarding your comments about access bridges, the following describes recreation facility access and pedestrian bridges included in the recreation plan.

Taylor Yard/Rio de Los Angeles State Park: As shown in the Reach 6 map depicted on Plate 8 to the Recreation Appendix, access is planned on the eastern edge of Taylor Yard. The access point is proposed near the southwest corner of the State Park property, which would be accessible due to the existing underpass. This would provide more convenient movement between Taylor Yard and the State Park. The Taylor Yard Bridge noted on the map is not a component of this project, but is currently in the planning stages at the City of Los Angeles.

Griffith Park Connections: In Reach 1, upgraded and new trails will improve connection of Griffith Park and the river. In Reach 4, new multi-use pathway will be placed along Griffith Park. As part of a separate project, the City of Los Angeles is seeking to place a non-motorized use bridge across the river in order to connect both banks and Griffith Park. This is the Atwater Bridge (La Kretz Crossing) in Reach 4.

B. Regarding your point relating to the cost/benefit analysis, while largest plans will generate the greatest benefits to the regional economy, both from project construction expenditures as well as anticipated post-construction redevelopment, the primary focus of the project is ecosystem restoration. The NER plan was identified based upon an evaluation of ecosystem

outputs relative to costs. The increased benefits for habitat value, nodal (local) and regional habitat connectivity, hydrologic connectivity, and aquatic ecosystem restoration provided by Alternatives 16 and 20, including the increase in Regional Economic Development (RED) benefits attained by these two larger alternatives, provided justification for their inclusion in the final array of alternatives considered. However, these added benefits also come at a significantly higher cost.

Following public review, a more detailed analysis was performed. This analysis identified a more cost effective variation on Alternative 13 (referred to in this IFR as “Alternative 13v” for variation) that is identical to Alternative 13 except for Reach 7, where it includes the reach plan included in Alternative 20 that provides 10 acres of marsh and a terraced bank connection to the Los Angeles State Historic Park as well as daylighting three streams and restoration of the lower Arroyo Seco. The analysis found that the Reach 7 plan included in Alternative 20 provides greater benefits than the Reach 7 plan included in Alternative 13, at lower cost.

The NER plan should be the justified alternative and scale having the maximum excess of monetary and non-monetary beneficial effects over monetary and nonmonetary costs. This plan occurs where the incremental beneficial effects just equal the incremental costs, or alternatively stated where the extra environmental value is just worth the extra costs. Selecting the NER plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of significance of outputs, cost effectiveness, efficiency, acceptability, and completeness. Compared to the rest of the alternatives, Alternative 13v is the plan that more than minimally meets these criteria. Accordingly, Alternative 13v has been identified as the NER plan.

However, the non-Federal Sponsor requested that Alternative 20 be recommended instead of the NER Plan, and the Corps requested that the Assistant Secretary of the Army (Civil Works) grant an exception to allow the Corps to recommend Alternative 20 as the locally preferred plan (LPP) instead of recommending the NER Plan. The ASA(CW) granted the requested LPP exception and permitted the Corps to recommend the LPP in the Final IFR and in the Chief of Engineers Report, in recognition of the additional benefits provided by this plan and strong support by federal, state and local agencies as well as various stakeholders and the general public. The features of the Alternative 20 recreation plan include trail improvements, pedestrian bridges, trail access points and wildlife viewing points. The recreation plan includes a separate benefit/cost analysis to show economic justification and federal interest in the recreation features.

## **9. Murphy, Deborah**

See GR-A.

## **10. Golding, Arthur**

See GR-A.

## **11. Jones, Andrew**

See GR-A.

**12. Higgins, Lila**

See GR-A.

**13. Appleton, Steven**

See GR-A.

**14. Cortes, David**

See GR-A.

**15. Madrid, Jorge**

See GR-A.

**16. Gedeon, "Blue" Geza**

See GR-A.

**17. Brown, Russell**

See GR-A.

**18. Barden, Lane**

See GR-A.

**19. Murphy, Edward**

See GR-A.

**20. Stefani, Giulia Good**

See GR-A.

**21. Sourial, Jill**

See GR-A.

**22. Sheedy, Keenan**

See GR-A.

**23. Jones, Susan**

See GR-A.

**24. Brownson, Omar**

See GR-A.

**25. Hans, Gerry**

See GR-A.

**26. West, Carolyn**

Some alternatives considered the widening of the south bank of the river within Reach 2 by modifying the channel wall from trapezoid to vertical. See response to written West letters.

**27. Oinuma, Colleen for Congressman Adam Schiff**

Thank you for your comments. Please reference response to written congressional letter under federal representatives above.

**28. Lombardi, Sergio**

See GR-A.

**29. Khan, Mohammed**

See GR-A.

**30. Vargas, Brenda for Congressman Xavier Becerra**

Thank you for your comments. Please reference response to written congressional letter under federal representatives above.

**31. DeRosa, Charles (LA Kayaking Club)**

See GR-A.

**32. Tachiki-Chin, Kim for Congresswoman Lucille Roybal-Allard**

Thank you for your comments. Please reference response to written congressional letter under federal representatives above.

**33. Tachiki-Chin, Kim for Pauline Louie**

See GR-A.

**34. Maulano, Lucia**

See GR-A.



**35. Hedge, Joanne**

See GR-A.

**36. Reyes, Ed**

A. Comment noted.

B. This is an important issue throughout the Los Angeles Watershed; however, the issues of recycled water, increased capture, and use of stormwater are outside of the scope of the ecosystem restoration study. It is the City's desire to use recycled water, when feasible for construction and maintenance of the completed project to support habitat.

C. Comment noted.

**37. MacAdams, Lewis**

See GR-A.

**38. Nunez, Irma Beserra**

See GR-A.

**39. Lester, Ely**

See GR-A.

**40. Moreau, Jack**

See GR-A.

**41. Drennan, Michael**

See GR-A.

**42. Bleitz-Sanburg, Dana**

See GR-A.

**43. Huerta, Denita**

See GR-A.

**44. O'Brien, Frank**

See responses to individual O'Brien letter.

**45. Benson, Mary**

See GR-A.

**46. Schlick, Alison**

See GR-A.

**47. Collins, Craig**

See GR-A.

**48. Morrison, William Rodriguez**

Thank you for your comments and interest in the Feasibility Study. The plan that is recommended and authorized by Congress will be cost shared between the Federal government and the non-Federal sponsor (in this case, the City of Los Angeles). The Federal cost sharing portion of the project will be funded through annual appropriations, passed by Congress and signed into law by the President. The non-Federal sponsor is responsible for providing a Self-Certification of Financial Capability to establish that it will be able to meet its cost sharing obligations for the project. This is included in the Final IFR.

**49. Barnett, Karen**

- A. Flood conveyance is the top priority for the LA River channel. Hydrologic and engineering analysis ensure that the channel will continue to convey floodwaters. There will be no change to flood levels, and therefore, no changes to FEMA flood zone mapping.
- B. The non federal sponsor is responsible for operation and maintenance of the project after construction. The non-Federal responsibilities are described in Section 7.2.2 of the Integrated Feasibility Report.
- C. This project is not intended specifically to replenish aquifers or groundwater tables. As an ecosystem restoration project, the goal is to increase habitat value throughout the study area.

**50. Landregan, Stephanie**

See GR-A.

**Public Meeting Comment Cards**

**Banner, Michael**

See GR-A.

**Brown, Lynn**

Thank you for your comment in support of the proposed plans for the Los Angeles River. The Recommended Plan includes a recreation plan. The recreation plan features are integrated into the ecosystem restoration plan; however, these features are formulated as separable components of the plan. The features of the recreation plan are designed to capitalize on the areas where substantial ecosystem restoration is proposed and are designed to prevent interference with restoration of ecologic function. Plan features and benefits include: improved quality and quantity of trails for multiple user groups along the river (including equestrian), increased connectivity of each side of the river's recreation resources, increased public safety through better signage and trail development along the river, improved viewing and lines of sight along the river, especially in areas of substantial restoration via the ecosystem restoration plan, opportunity for interpretive signage and environmental education, and improved public health by providing opportunities for exercise and psychological respite. The proposed recreation features have been developed at a feasibility level. However, it is anticipated that unpaved multiuse trails will be open for equestrian use as feasible (e.g., as long as safety of people, horses, and wildlife can be safely accommodated simultaneously without negative effects on the restoration features).

**Burman, Tsilah**

See GR-A.

**Cheng, Suellen**

See GR-A.

**Hernandez, Mike**

See GR-A.

**Kumamoto, Alan**

See GR-A.

**Kumamoto, Joanne**

See GR-A.

**Lambarri, Ally**

Thank you for your participation. Youth are definitely encouraged to participate in the process.

**Lowry, Mike**

Habitat units used in the analysis are described in Section 4.9 of the report. Habitat units were based on an assessment of habitat and quantity. The inclusion of neighboring communities did not factor into the habitat outputs analyzed. However, the overall process does consider

Environmental Quality, Regional Economic Development, and Other Social Effects, which is where the inclusion of benefits to neighboring communities would be considered.

**McQuiston, J.**

This is an important issue throughout the Los Angeles Watershed; however, the issues of recycled water, increased capture, and use of stormwater are outside of the scope of Corps ecosystem restoration. It is the City's desire to use recycled water, when feasible, for construction and maintenance of the completed project to support habitat.

**Rankell, David**

Comment noted.

**Reagan, Rourk**

See GR-A.

**Sanburg, Delmer**

See GR-A.

**Sebahar, Thomas**

1. Your concerns are noted. Groundwater pollutant potential is addressed in the Evaluation of Alternative Plans and Environmental Consequences Section 5.4.3 of the report.
2. The selected alternative is not expected to increase mosquito populations above existing conditions, and operation of the project will include the ongoing monitoring of pest populations and coordination with vector control agencies as needed to provide treatment (Section 5.11.3).
3. Your cost concerns are noted.

**Shankar, Cheri**

See GR-A.

**Stephenson, Roads**

See GR-A.

**Taylor, Ric**

See GR-A.

**Teran, Alexia**

1. No taxes are proposed by the study, but identification of specific funding sources for the non-Federal share is not part of the analysis in the study. Project funding will be accomplished in phases over many years, with Federal funding subject to appropriations. The first step is project

authorization. The next step is project financing. Upon authorization of the project, the City, as non-Federal sponsor, will work with its partners in the public, private, and nonprofit sectors to develop a financing plan that balances the investment in this project with those of other public priorities. Project authorization does not obligate any local funds. Project authorization will identify the details of the project, which can then be matched with appropriate funding sources.

2. The Corps is supportive of educating the public in the importance of clean watersheds.

**Walnum, Ann**

See GR-A.

**Wendlandt, Wendy**

See GR-A.

**Wilhelm, Nicholas**

See GR-A.

**Yesayan, Erik**

See GR-A.

**Zuniga, Rubi**

The commenter refers to “Proposition 20” instead of Alternative 20, but for the purposes of the response, these are assumed to be the same. Project funding will be accomplished in phases over many years, with Federal funding subject to appropriations. The first step is project authorization. The next step is project financing. Upon authorization of the project, the City, as non-Federal sponsor, will work with its partners in the public, private, and nonprofit sectors to develop a financing plan that balances the investment in this project with those of other public priorities. Project authorization does not obligate any local funds. Project authorization will identify the details of the project, which can then be matched with appropriate funding sources.